

Exhibit A

Trial Exhibit

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

IN RE:

GARLOCK SEALING TECHNOLOGIES
LLC, et al.,

Debtors.¹

Case No. 10-BK-31607

Chapter 11

Jointly Administered

**DEBTORS' SUMMARY OF EVIDENCE
REGARDING CERTAIN RFA LIST 1.A CASES**

¹ The debtors in these jointly administered cases are Garlock Sealing Technologies LLC; Garrison Litigation Management Group, Ltd.; and The Anchor Packing Company (hereinafter "Garlock" or "Debtors").

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INTRODUCTION

This document summarizes documents and other evidence pertaining to eighteen resolved mesothelioma claims against Garlock Sealing Technologies LLC (“Garlock”). This evidence includes, among other things, documents from underlying tort-system lawsuits—for example, plaintiffs’ interrogatory responses and deposition transcripts—as well as asbestos Trust claims, bankruptcy ballots, and Bankruptcy Rule 2019 statements. A complete list of the evidence summarized in this document is attached as Exhibit A.¹

In February 2013, Debtors served the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) and the Future Claimants’ Representative (the “FCR”) with a list of twenty-six cases in which they contended there was a misrepresentation or omission of asbestos exposures. The parties have referred to this list as “RFA List 1.A.” Debtors received full discovery concerning Trust claims, ballots, and 2019 statements with respect to only seventeen plaintiffs, known as the “Designated Plaintiffs,” on this list. The document requests pertaining to these plaintiffs were made in connection with Rule 30(b)(6) depositions of six law firms: Waters & Kraus, Simon Greenstone Panatier & Bartlett (f/k/a Simon Eddins & Greenstone, or “Simon Eddins”), Belluck & Fox, The David Firm, Williams Kherkher Hart & Boundas (“Williams Kherkher”), and the Shein Law Center. Evidence from fifteen of the sixteen resolved Designated Plaintiff cases is summarized below in Section A.²

Section A of this document is drawn from a memorandum provided by Robinson Bradshaw & Hinson to Professor Lester Brickman, which was disclosed to the Committee and FCR on April 24, 2013. It has been updated to refer to the exhibit numbers in Debtors’ exhibit

¹ For ease of reference, each document citation in this summary includes a parenthetical reference to that document’s corresponding exhibit number.

² The remaining resolved Designated Plaintiff case is Grover Weikel. Debtors learned in discovery that, contrary to their belief, Williams Kherkher did not handle the Weikel case. Because Debtors did not have the opportunity to depose the law firm that did handle the case in the tort system, they do not intend to focus on the case at trial.

list, and minor corrections have been made that were provided to Professor Brickman in an update memorandum from Robinson Bradshaw & Hinson and disclosed to the Committee and FCR before Professor Brickman's deposition.

Section B contains a summary of three cases from RFA List 1.A where Garlock obtained an order from a court requiring the plaintiff (over the plaintiff's objection) to disclose Trust claims evidencing previously undisclosed exposures before trial. In these three cases, Garlock then used the claim forms at trial to obtain a defense verdict. Section B is drawn from the memorandum described above provided by Robinson Bradshaw & Hinson to Professor Lester Brickman, disclosed to the Committee and FCR on April 24, 2013. It has been updated to refer to the exhibit numbers in Debtors' exhibit list.

A. Summaries of Designated Plaintiff Cases

1. Robert Treggett—Waters & Kraus (Ron Eddins)—Los Angeles, California

Mr. Treggett obtained the largest verdict against Garlock in its history: \$9 million compensatory damages and \$15 million punitive damages (Garlock settled for compensatory damages during the appeal).³ In response to standard interrogatories asking Mr. Treggett to identify all his asbestos exposures, he and his attorneys identified only two products from bankrupt companies: Flexitallic (a gasket) and Worthington pumps.⁴ At his deposition, Mr. Treggett identified no additional bankrupt products, claiming (for example) that he did not remember the manufacturer of the asbestos insulation he encountered during his time aboard the nuclear submarine USS John Marshall.⁵

The role of amosite insulation in causing Mr. Treggett's mesothelioma was a major issue at trial. Mr. Treggett generally minimized his insulation exposure. For example, at trial, Mr. Treggett claimed he spent 70% of his time aboard the nuclear submarine removing gaskets and, at most, 3% of his time removing insulation around the flange, most of which was in the form of chrysotile blankets, not amosite pipe covering.⁶ Mr. Treggett also downplayed any asbestos exposure he experienced in shipyards (where insulation exposures were common), claiming for example that at the Mare Island Shipyard in California from 1965 to 1966 he only did classroom work, did not board ships, and saw ship construction and overhaul only from a distance.⁷

³ 10/15/04 Trial Tr. at 6902-13 (GST-5400).

⁴ Plaintiff's Responses to General Order Standard Interrogatories Propounded by Defendants at 14-16, Ex. A (Feb. 6, 2004) (GST-5494 & GST-1171).

⁵ Treggett Depo. Tr. at 536-37 (GST-5499).

⁶ 9/15/04 Trial Tr. at 751, 811-13 (Testimony of Mr. Treggett) (GST-5443); 10/6/04 Trial Tr. at 5213 (Plaintiff's Closing Argument) (GST-5437).

⁷ Treggett Depo. Tr. at 261-63 (GST-5432); 9/16/04 Trial Tr. 1242-43 (Testimony of Mr. Treggett) (GST-5444).

At trial, Garlock attempted to prove Mr. Treggett's exposure to bankrupt products, including amosite insulation, through expert testimony and ship records.⁸ But Mr. Treggett's attorneys cross-examined Garlock's experts regarding their basis for this conclusion.⁹ Then, at the charge conference, Mr. Eddins (later a founding partner of the Simon Eddins firm) successfully opposed inclusion of any bankrupt companies on the verdict form, including Pittsburgh Corning (responsible for the notoriously dangerous insulation Unibestos, which was more than 60% amosite asbestos), stating, "[T]here is not a single piece of evidence that puts Unibestos aboard the boat."¹⁰ Ultimately, although California permits allocation of fault to bankrupt companies for the purpose of apportioning noneconomic damages, no bankrupt companies appeared on the jury form.

In closing argument, Mr. Eddins focused on Garlock's inability to prove Mr. Treggett was exposed to Unibestos and cast doubt on whether amosite insulation contributed to Mr. Treggett's mesothelioma: "There isn't Unibestos [on the jury form] because they didn't bring proof that there was Unibestos on that ship. They couldn't. It's not true They thought we'll try to prove this amosite thing and say it's all that amosite, and they didn't do it, and they couldn't do it, because it's not true."¹¹ The jury assigned 40% of the fault for Mr. Treggett's injury to Garlock, and no fault at all to any amosite insulation companies.¹²

In fact, months before the trial and Mr. Eddins' statements about Unibestos in closing argument, Mr. Treggett's attorneys at Waters & Kraus had cast a ballot for him in the Pittsburgh Coming bankruptcy case, certifying under penalty of perjury that Mr. Treggett was exposed to

⁸ 9/28/04 Trial Tr. at 3323-24 (Testimony of Robert Sawyer, M.D.) (GST-5450).

⁹ 9/28/04 Trial Tr. at 3379-3382, 3617-18 (GST-5450).

¹⁰ 10/6/04 Trial Tr. at 5177, 5184-86 (GST-5437).

¹¹ 10/6/04 Trial Tr. at 5208-13 (GST-5437); 10/8/04 Trial Tr. at 5742-44 (GST-5440).

¹² 10/15/04 Trial Tr. at 6907 (GST-5440).

Unibestos.¹³ This ballot was never provided to Garlock and the exposure was never disclosed. Then, starting just a couple months after the trial, Mr. Treggett's attorneys filed fourteen Trust claims and nine more ballots on the basis of exposures never identified in his tort case.¹⁴ Waters & Kraus placed Mr. Treggett on 2019 statements in eleven bankruptcy cases, beginning only two months after trial in December 2004, certifying that Mr. Treggett had been injured by asbestos-containing products made, distributed, or sold by the debtor companies.¹⁵ In his tort case, Mr. Treggett identified none of the exposures underlying those certifications under penalty of perjury in the 2019 statements. In all, the Trust claims, ballots, and 2019 statements evidence twenty-two exposures not identified in discovery.¹⁶

Six of the Trust claims were based upon Mr. Treggett's work at the Mare Island shipyard, where he claimed during the tort case he was in a classroom and never went on board a ship—including claims against Trusts responsible for amosite insulation such as AWI, Fibreboard, Owens Corning, and Western Asbestos (the Western claim filed only shortly after Mr. Treggett's trial against Garlock).¹⁷ The claim forms painted a starkly different picture of his exposure history, claiming that at Mare Island he worked in the "shipyard repair/construction industry" and "altered, repaired or otherwise worked with an asbestos-containing product such that [he] was exposed on a regular basis to asbestos fibers," and "was employed in an industry or occupation such that [he] worked on a regular basis in close proximity to workers" manipulating

¹³ Treggett 2004 PCC Ballot at GST-EST-0555991 (GST-54455); Kraus Depo. Tr. at 92-93 (GST-1299). The short form citations for ballots, Trust claims, and 2019 statements are located in the Appendix *infra*.

¹⁴ See Summary Chart of Treggett Filings *infra*.

¹⁵ See Summary Chart of Treggett Filings *infra*.

¹⁶ See *id.*

¹⁷ Treggett Lummus Trust Claim at Waters 02350 (GST-5478); Treggett AWI Trust Claim at Waters 02423 (GST-5480); Treggett Combustion Trust Claim at Waters 2520 (GST-5483); Treggett FB Trust Claim at Waters 02561 (GST-5485); Treggett OC Trust Claim at Waters 02685 (GST-5489); Treggett Western Trust Claim at Waters 02826 (GST-5493).

asbestos products.¹⁸ One of the claims based on Mare Island was filed just a couple months after the trial against Garlock ended.¹⁹

At his deposition in this bankruptcy case, Mr. Peter Kraus admitted that it is his firm's practice to delay filing Trust claims until after the conclusion of tort litigation in order to avoid bankrupt entities being placed on the verdict form and allocated fault in several or proportional liability jurisdictions (such as California, where the Treggett case was tried).²⁰

¹⁸ Treggett OC Trust Claim at Waters 02685-02687 (GST-5489).

¹⁹ Treggett Western Trust Claim at Waters 02812 (GST-5493).

²⁰ Kraus Depo. Tr. at 41:13-42:24 (GST-1299).

Summary Chart of Treggett Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ABB Lummus	Yes (3/14/07) ¹	Yes (3/20/08) ³	Yes (9/21/06) ⁴
ACandS	Yes ²		
Armstrong World Industries	Yes (10/9/07) ⁵		
Babcock & Wilcox	Yes (1/10/07) ⁶		
C.E. Thurston	Yes ⁷		
Combustion Engineering	Yes ⁸		Yes (10/3/05) ⁹
DII (Halliburton)	Yes (1/23/07) ¹⁰		
Eagle Picher	Yes (8/21/09) ¹¹		
Federal Mogul	Yes (7/28/11) ¹²	Yes (10/29/04) ¹³	
Fibreboard	Yes (2/21/11) ¹⁴		
Flintkote		Yes (12/12/08) ¹⁵ , 9/16/09 ¹⁶	
G-I Holdings (GAF)		Yes (1/7/09) ¹⁷	Yes (1/21/09) ¹⁸
GIT			Yes (12/9/04) ¹⁹
Kaiser Aluminum		Yes (11/9/05) ²⁰	Yes (12/9/04) ²¹
Keene	Yes (10/27/09) ²²		
NARCO		Yes (3/9/06) ²³	Yes (12/9/04) ²⁴
Owens Corning	Yes (2/23/11) ²⁵	Yes (8/15/06) ²⁶	Yes (3/15/05) ²⁷
Pittsburgh Corning		Yes (2/23/04) ²⁸ , 11/10/09 ²⁹	Yes (12/9/04) ³⁰
Porter Hayden	Yes ³¹		
Raybestos	Yes (6/17/10) ³²		
US Minerals		Yes (10/26/05) ³³	Yes (3/15/05) ³⁴
USG	Yes (10/27/09) ³⁵		Yes (3/15/05) ³⁶
W.R. Grace		Yes (5/19/09) ³⁷	Yes (5/14/09) ³⁸
Western Asbestos	Yes (12/28/04) ³⁹		

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Treggett Lummus Trust Claim at Waters 02358 (GST-5478).

² Treggett AC&S Trust Claim at Waters 02369 (GST-5479).

³ Treggett AC&S Ballot at Waters 02228 (GST-6030).

⁴ AC&S 2019 of Waters & Kraus at Waters 10540-10542 (GST-5515).

⁵ Treggett AWI Trust Claim at Waters 02434 (GST-5480).

⁶ Treggett B&W Trust Claim at Waters 02500 (GST-5481).

- ⁷ Treggett Thurston Trust Claim at Waters 02511 (GST-5482).
- ⁸ Treggett Combustion Trust Claim at Waters 02514 (GST-5483).
- ⁹ Combustion 2019 of Waters & Kraus at Waters 10585-10587 (GST-5522).
- ¹⁰ Treggett HAL Trust Claim at Waters 02610 (GST-5487).
- ¹¹ Treggett EPI Trust Claim at Waters 02539 (GST-5484).
- ¹² Treggett FM Trust Claim at Waters 02597 (GST-5486).
- ¹³ Treggett FM Ballot at Waters 02244 (GST-5468).
- ¹⁴ Treggett FB Trust Claim at Waters 02552 (GST-5485).
- ¹⁵ Treggett 2008 Flintkote Ballot at GST-EST-0555971 (GST-4348).
- ¹⁶ Treggett 2009 Flintkote Ballot at Waters 02254 (GST-4347).
- ¹⁷ Treggett GAF Ballot at Waters 02286 (GST-5471).
- ¹⁸ GAF 2019 of Waters & Kraus at Waters 02171-02173 (GST-5458).
- ¹⁹ GIT 2019 of Waters & Kraus at Waters 10610-10612 (GST-5526).
- ²⁰ Treggett Kaiser Ballot at Waters 02295 (GST-6038).
- ²¹ Kaiser 2019 of Waters & Kraus at Waters 10732-10734 (GST-5545).
- ²² Treggett Keene Trust Claim at Waters 02655 (GST-5488).
- ²³ Treggett NARCO Ballot at Waters 02300 (GST-5473).
- ²⁴ NARCO 2019 of Waters & Kraus at Waters 10768-10770 (GST-5551).
- ²⁵ Treggett OC Trust Claim at Waters 02676 (GST-5489).
- ²⁶ Treggett OC Ballot at Waters 02308 (GST-5474).
- ²⁷ Amended OC 2019 of Waters & Kraus at Waters 10878-10880 (GST-5570).
- ²⁸ Treggett 2004 PCC Ballot at GST-EST-0555996 (GST-5455).
- ²⁹ Treggett 2009 PCC Ballot at Waters 02317 (GST-5475).
- ³⁰ PCC 2019 of Waters & Kraus at Waters 10919-10921 (GST-5576).
- ³¹ Treggett PH Trust Claim at Waters 02708 (GST-5490).
- ³² Treggett Raybestos Trust Claim at Waters 02753 (GST-5491).
- ³³ Treggett USM Ballot at Waters 02324 (GST-5476).
- ³⁴ Amended USM 2019 of Waters & Kraus at Waters 11096-11098 (GST-4431).
- ³⁵ Treggett USG Trust Claim at Waters 02764 (GST-5492).
- ³⁶ Amended USG 2019 of Waters & Kraus at Waters 11065-11067 (GST-5595).
- ³⁷ Treggett WRG Ballot at Waters 02333 (GST-5477).
- ³⁸ 2nd Amended WRG 2019 of Waters & Kraus at Waters 02220-02222 (GST-5466).
- ³⁹ Treggett Western Trust Claim at 02831 (GST-5493).

2. Oscar Torres—Williams Kherkher (Troy Chandler)—Texas

Mr. Torres obtained the only significant mesothelioma verdict against Garlock between 2006 and its bankruptcy petition in 2010 that has not yet been reversed on appeal: 45% of a \$3 million compensatory damages verdict, or \$1.35 million.¹ In response to Texas standard interrogatories that he amended seven times before trial, Mr. Torres identified no bankrupt products, including in response to the specific Texas question about bankrupt exposures.² He also did not identify any Trust claims in response to the standard Texas interrogatory asking about any Trust claim that “was or will be made,” and did not produce any Trust claim forms in response to the standard request for production requiring production of such claim forms, claiming the question was “not applicable” to him and that there were no Trust claims at that time.³ Mr. Torres throughout his case claimed that the only asbestos-containing products he handled directly were Garlock crocidolite gaskets.⁴ He also denied knowledge of the name “Babcock & Wilcox.”⁵

At trial, Garlock attempted to prove that Mr. Torres’ mesothelioma was caused not by Garlock gaskets but by insulation products, including Kaylo pipe covering manufactured by Owens Corning.⁶ In the absence of identification of insulation products by Mr. Torres or his attorneys, Garlock tried to prove Mr. Torres’ exposure to Kaylo in its cross-examination of Dr. Lemen, one of Mr. Torres’ experts.⁷ Mr. Torres’ attorneys later argued that there was no evidence or legally insufficient evidence that Owens Corning and Johns Manville proximately

¹ 3/5/10 Trial Tr. at 8 (GST-4861).

² Plaintiffs’ Seventh Supplemental Responses to Master Interrogatories, Requests for Production and Disclosures at 9-10, 13-14, 21-23 (Feb. 15, 2010) (GST-4926).

³ *Id.* at 13-14, 48-49.

⁴ 2/17/10 Trial Tr. at 45 (plaintiff opening) (“The only asbestos product Oscar actually worked with himself was the Garlock gaskets.”) (GST-4850); 3/4/10 Trial Tr. at 69-70 (“The reason why Garlock is more of a cause is because the only product that Oscar used hands-on was Garlock . . .”) (GST-4860).

⁵ 7/16/09 Torres Depo. Tr. at 91:5-7 (GST-4639).

⁶ *See, e.g.*, 3/4/10 Trial Tr. at 105, 109, 113, 120, 128 (closing argument) (GST-4860).

⁷ 2/19/10 Trial Tr. at 82-95 (GST-4852).

caused Mr. Torres' mesothelioma.⁸ Over the objection of Mr. Torres' attorneys, the court permitted Owens Corning and Johns-Manville to be placed on the verdict form.⁹ Then, in closing arguments, Mr. Torres' attorneys vigorously denied he was exposed to Owens Corning insulation.¹⁰ The jury assigned no fault to Owens Corning or Johns-Manville.¹¹

In fact, the day before Mr. Torres' deposition where he denied knowledge of "Babcock & Wilcox," Mr. Torres filed a claim against the Babcock & Wilcox Trust, which was eventually paid.¹² This claim was never disclosed to Garlock, in violation of Texas discovery rules.¹³ Mr. Torres' trial attorney, at his deposition in this bankruptcy case, claimed he did not know about the Babcock & Wilcox claim during the tort case, but he admitted that the attorney who filed the claim reported directly to him.¹⁴ Also, after the trial concluded, Mr. Torres filed a claim with the Owens Corning Trust despite his attorney's representation during trial that he was not exposed to Owens Corning products (this claim too was eventually paid).¹⁵

Most surprising of all, in both the Babcock & Wilcox Trust claim and the Owens Corning Trust claim, Mr. Torres represented that he "handled raw asbestos fibers on a regular basis" and "fabricated asbestos-containing products such that [he] in the fabrication process was exposed on a regular basis to raw asbestos fibers."¹⁶ No handling of raw asbestos was disclosed in the tort case.¹⁷ To the contrary, Mr. Torres and his attorneys claimed repeatedly that the only asbestos

⁸ 3/4/10 Trial Tr. at 21 (GST-4860).

⁹ 3/3/10 Trial Tr. at 253-54 (GST-4859); 3/4/10 Trial Tr. at 21-22 (GST-4860).

¹⁰ 3/4/10 Trial Tr. at 56, 58 (GST-4860).

¹¹ 3/5/10 Trial Tr. at 8 (GST-4861).

¹² Torres B&W Trust Claim at WK0001-0009 (GST-4927).

¹³ Chandler Depo. Tr. at 52:9-53:1 (GST-1020).

¹⁴ *Id.*

¹⁵ Torres OC Trust Claim at WK0086-0095 (GST-4929).

¹⁶ Torres B&W Trust Claim at WK0006 (GST-4927); Torres OC Trust Claim at WK0092 (GST-4929).

¹⁷ When confronted with these statements in the Trust claims, Mr. Torres' attorney claimed that the "raw asbestos fibers" referred to asbestos from Garlock's gaskets—a finished product. Chandler Depo Tr. at 63:3-64:2 (GST-1020).

products Mr. Torres ever handled were Garlock crocidolite gaskets, a finished product that did not involve “raw asbestos fibers.”

Summary Chart of Torres Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
AMF	Yes (4/1/11) ¹		
Babcock & Wilcox	Yes (7/15/09) ²		
DII (Halliburton)	Yes (5/18/11) ³		
Owens Corning	Yes (5/18/11) ⁴		

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
 = Exposure disclosed during discovery
 = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Torres AMF Trust Claim at WK 0128 (GST-4930).

² Torres B&W Trust Claim at WK 0001 (GST-4927).

³ Torres HAL Trust Claim at WK 0041 (GST-4928).

⁴ Torres OC Trust Claim at WK 0086 (GST-4929).

3. Peter Homa—Belluck & Fox, David Firm—New York, New York

Garlock settled Mr. Homa's mesothelioma claim for \$250,000—along with a large group of other cases—after eighteen days of trial in New York City that pitted Mr. Homa against Garlock as sole remaining defendant. In response to standard NYC interrogatories asking Mr. Homa to identify all sources of exposure, including his exposure to the products of bankrupt companies, he and his attorneys identified no bankrupt companies.¹ In his deposition, Mr. Homa identified Worthington pumps, Babcock & Wilcox (a bankrupt boiler manufacturer) and Flexitallic (a bankrupt gasket manufacturer), but he identified no other bankrupt companies, despite being specifically asked about over a dozen such manufacturers.² New York City requires exigent mesothelioma plaintiffs such as Mr. Homa to file all Trust claims they intend to file at least ninety days before trial, and disclose the Trust claim forms.³ Mr. Homa and his attorneys disclosed no Trust claims that they had filed or intended to file before trial or the eventual settlement.⁴

At trial, Garlock attempted to prove Mr. Homa's exposure to insulation and other dangerous amphibole products manufactured by companies such as Pittsburgh Corning, Johns-Manville, Eagle Picher, and Keene through expert testimony and ship records showing product specifications for the ships where Mr. Homa worked.⁵ But Mr. Homa's attorneys crossed

¹ Plaintiffs' Response to Defendants' Fourth Amended Interrogatories and Request for Production of Documents at 10, 11, Chart A (May 29, 2008) (GST-3629).

² 6/17/08 Homa Depo. Tr. at 57-58 (Babcock & Wilcox) (GST-3614); 6/18/08 Homa Depo. Tr. at 260, 288-89 (disclaiming knowledge of Eagle Picher, Johns-Manville, Keene, Owens Corning, Philip Carey, Pittsburgh Corning, Raybestos, Raymark, USG, National Gypsum, Combustion Engineering) (GST-2897); 10/2/08 Homa Depo. Tr. at 50-51 (Flexitallic) (GST-3613); 5/7/09 Trial Tr. at 961-63, 969-70 (reading into evidence Homa deposition disclaiming knowledge of Eagle Picher, Johns-Manville, Keene, Owens Corning, Philip Carey, Pittsburgh Corning, Raybestos, Raymark, USG, National Gypsum, and Combustion Engineering) (GST-3621).

³ See Decision and Order, *In re New York City Asbestos Litig.*, No. 40000/88 (N.Y. Sup. Ct. Nov. 15, 2012) (Heitler, J.) (citing, explaining, and refusing to vacate section XV(E)(2)(I) of the NYCAL CMO, which the court noted has been in the CMO since 2003) (GST-0402).

⁴ Belluck Depo. Tr. at 151:7-152:8, 152:20-153:7 (GST-1019).

⁵ 4/27/09 Trial Tr. at 90, 100 (GST-3615); 5/6/09 Trial Tr. at 740 *et seq.* (GST-3620); 5/13/09 Trial Tr. at 1381 (direct by Garlock) (GST-3624).

Garlock's experts and attempted to cast doubt on this use of ship records, calling into question whether the products reflected in the documents were on the ship when Mr. Homa was there.⁶

Mr. Homa eventually filed twenty-two Trust claims, four ballots, and five 2019 statements never disclosed to Garlock, with a total of twenty-six unidentified exposures (from nineteen of the Trust claims, four of the ballots and three of the 2019 statements).⁷ Many of the Trust claims relied on exposures to specific insulation products never disclosed in discovery, such as GAF #115 Insulating Cement, Kaiser Hard Top Insulating Cement, and Pilsulate Insulating Cement #101.⁸

The David Law Firm, which filed Mr. Homa's Trust claims, testified that, shortly after he retained the firm, it interviewed Mr. Homa and identified Trust claims he had and that they intended to file and could have filed for Mr. Homa long before his trial in compliance with the New York rule requiring filing and disclosure of such claims.⁹ But instead, Belluck & Fox (according to the David Firm) instructed the David Firm not to file Trust claims before Mr. Homa's case was concluded, in violation of the New York requirement.¹⁰ This testimony from the David Firm contradicted the Belluck firm's testimony that they had no input into the timing of Trust claims for Mr. Homa.¹¹

At least eight of the Trust claims were filed *the day after* Garlock settled the case at trial—according to the David Firm, they filed the claims as soon as Belluck & Fox told them the case had been resolved.¹² At least one of the Trust claims (with the Manville Trust) was filed months before trial and never disclosed, also in clear violation of NYC discovery rules, as was a

⁶ 5/4/09 Trial Tr. at 628-29 (GST-3619); 5/13/09 Trial Tr. at 1398-99, 1409, 1452, 1454 (GST-3624).

⁷ See Summary Chart of Homa Filings.

⁸ Homa GAF Trust Claim at David 00809-00810 (GST-3598); Homa Kaiser Trust Claim at David 01217-01218 (GST-3603); Homa Plibrico Trust Claim at David 01592-01593 (GST-3608).

⁹ Cooper Depo. Tr. at 72:11-18, 73:15-22 (GST-1021).

¹⁰ *Id.* at 75:1-17.

¹¹ Belluck Depo. Tr. at 187:4-189:1 (GST-1019).

¹² See Summary Chart of Homa Filings *infra*; Cooper Depo. Tr. at 75:1-17 (GST-1021).

ballot in the Flintkote case.¹³ Finally, eleven of the Trust claims were based on asbestos exposure at seven sites where Mr. Homa had testified he was never exposed to asbestos at all, including a site where he alleged, in his tort case against Garlock, that he only drove a truck, as well as a site where he alleged, in his tort case against Garlock, that he only worked as a police officer.¹⁴

¹³ Homa Manville Trust Claim at David 01205 (GST-3602); Homa 2008 Flintkote Ballot at GST-EST-0555957 & GST-EST-0555969 (GST-3636 & GST-3637).

¹⁴ See Plaintiffs' Response to Defendants' Fourth Amended Interrogatories and Request for Production of Documents at 10, 11, Chart A (May 29, 2008) (listing sites where exposure alleged in tort case) (GST-3629); 6/17/08 Homa Depo. Tr. at 74-76 (no asbestos exposure at Newport Naval Hospital), 86 (no asbestos exposure at Naval Technical Training Center in Jacksonville, FL), 88-93 (no exposure on USS Pensacola, USS Albany, Norfolk Naval Sea Systems Command, Norfolk Naval Shipyard (1979-85), USS Raleigh) (GST-3614); Belluck Depo. Tr. at 246-55 (GST-1019); Homa AWI Trust Claim at David 00362-00364 (GST-3591); Homa B&W Trust Claim at 00371-00396 (GST-3592); Homa Combustion Trust Claim at David 00419-00422 (GST-3593); Homa FB Trust Claim at David 00587-00589 (GST-3596); Homa GAF Trust Claim at David 00809-00810 (GST-3598); Homa IIAL Trust Claim at David 00943-00950 (GST-3599); Homa Keene Trust Claim at David 01335 (GST-3604); Homa OC Trust Claim at David 01466-01474 (GST-3606); Homa Plibrico Trust Claim at David 01592-01593 (GST-3608); Homa Raybestos Trust Claim at David 01713-01715 (GST-3609); Homa Shook & Fletcher Trust Claim at David 01720 (GST-3610).

Summary Chart of Homa Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
Armstrong World Industries	Yes (5/15/09) ¹	Yes (8/4/09) ²	
ASARCO			
Babcock & Wilcox	Yes (5/15/09) ³		
Celotex	Yes (5/15/09) ⁴		
Combustion Engineering	Yes ⁵		
Eagle Picher	Yes ⁶		
Federal Mogul	Yes (11/22/10) ⁷		
Fibreboard	Yes (5/15/09) ⁸		
Flintkote		Yes (12/16/08) ⁹	Yes (10/2/12) ¹⁰
GIT			Yes (10/2/12) ¹¹
G-I Holdings (GAF)	Yes ¹²		
H.K. Porter	Yes ¹³		
DII (Halliburton)	Yes (5/15/09) ¹⁴		
DII (Harbison Walker)	Yes (3/16/10) ¹⁵		
Kaiser Aluminum	Yes ¹⁶		
Keene	Yes (5/15/09) ¹⁷		
Manville	Yes (11/17/08) ¹⁸		
National Gypsum	Yes ¹⁹		
NARCO			Yes (10/2/12) ²⁰
Owens Corning	Yes (5/15/09) ²¹		
Pacor	Yes (5/20/09) ²²		
Pittsburgh Corning		Yes (11/12/09) ²³	Yes (10/2/12) ²⁴
Plibrico	Yes ²⁵		
Quigley		Yes (11/15/12) ²⁶	
Raybestos	Yes (3/16/10) ²⁷		
Shook & Fletcher	Yes ²⁸		
UNR	Yes ²⁹		
USG	Yes (5/15/09) ³⁰		
W.R. Grace			Yes (10/2/12) ³¹

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

- ¹ Homa AWI Trust Claim at David 00354 (GST-3591).
- ² Homa 2009 ASARCO Ballot at GST-EST-0555894 & GST-EST-0555900 (GST-3634 & GST-3635).
- ³ Homa B&W Trust Claim at David 00368 (GST-3592).
- ⁴ Homa Celotex Trust Claim at David 00532 (GST-3594).
- ⁵ Homa Combustion Trust Claim at David 00408 (GST-3593).
- ⁶ Homa EPI Trust Claim at David 00553 (GST-3595).
- ⁷ Homa FM Trust Claim at David 00592 (GST-3597).
- ⁸ Homa FB Trust Claim at David 00573 (GST-3596).
- ⁹ Homa 2008 Flintkote Ballot at GST-EST-0555959 & GST-EST-0555969 (GST-3636 & GST-3637).
- ¹⁰ Amended Flintkote 2019 of David at David 00040-00041 (GST-1830).
- ¹¹ Amended GIT 2019 of David at David 00043-00044 (GST-1831).
- ¹² Homa GAF Trust Claim at David 00804 (GST-3598).
- ¹³ Homa IIKP Trust Claim at David 01064 (GST-3600).
- ¹⁴ Homa IIAI Trust Claim at David 00927 (GST-3599).
- ¹⁵ Homa IIW Trust Claim at David 01083 (GST-3601).
- ¹⁶ Homa Kaiser Trust Claim at David 01211 (GST-3603).
- ¹⁷ Homa Keene Trust Claim at David 01334 (GST-3604).
- ¹⁸ Homa Manville Trust Claim at David 01205 (GST-3602).
- ¹⁹ Homa NGC Trust Claim at 01337 (GST-3605).
- ²⁰ Amended NARCO 2019 of David at David 00046-00047 (GST-1832).
- ²¹ Homa OC Trust Claim at David 01456 (GST-3606).
- ²² Homa Pacor Trust Claim at David 01480 (GST-3607).
- ²³ Homa 2009 PCC Ballot at GST-EST-05556103 & GST-EST-05556104 (GST-3638 & GST-3639).
- ²⁴ Amended PCC 2019 of David at David 00049-00050 (GST-1833).
- ²⁵ Homa Plibrico Trust Claim at David 01586 (GST-3608).
- ²⁶ Homa 2012 Quigley Ballot at David 00061.
- ²⁷ Homa Raybestos Trust Claim at David 01709 (GST-3609).
- ²⁸ Homa Shook & Fletcher Trust Claim at David 01716 (GST-3610).
- ²⁹ Homa UNR Trust Claim at David 01722 (GST-3611).
- ³⁰ Homa USG Trust Claim at David 01725 (GST-3612).
- ³¹ Amended WRG 2019 of David at David 00037-00038 (GST-1829).

4. Bernard Massinger—Shein Law Center—Philadelphia, Pennsylvania

Garlock settled Mr. Massinger's mesothelioma claim for \$700,000 after ten days of trial in Philadelphia, along with a group of other claims brought by Shein Law Center. Mr. Massinger was young (in his fifties), and thus had a compelling damages case.¹ During discovery, Mr. Massinger claimed his mesothelioma was caused by asbestos brought home on his father's clothes, including asbestos from Garlock gaskets.² At his deposition, he denied he was ever directly exposed to asbestos, including during his Air Force service from 1978 to 1980 at the Air Force bases in Lackland, Texas, and Dover, Delaware. He claimed that the Air Force "for the time I was in there was very proactive as far as asbestos abatement and things like that."³

In fact, in May 2009, months before trial began, and before another deposition of Mr. Massinger taken in the case,⁴ Mr. Massinger signed an affidavit in support of Trust claims, attesting to "personal knowledge" that he "was exposed to asbestos containing products" at the Lackland, Texas; Shepherd, Texas; and Dover, Delaware bases.⁵ He attested that at those bases he "worked with and in the vicinity [of] other tradesmen who used asbestos containing products during my job of maintaining and testing the backup power equipment. Use of those products created dust which I inhaled."⁶ This direct exposure, which completely changed the nature of Mr. Massinger's exposure to asbestos, was never disclosed to Garlock and was contradicted by Mr. Massinger at his deposition.

¹ Shein Depo. Tr. at 133:23-134:16 (GST-1030).

² *Id.*

³ 7/2/08 Massinger Depo. (*de bene esse*) Tr. at 13-16, 26-27 (GST-3673); 7/2/08 Massinger Depo. (discovery) Tr. at 23-27 (GST-3671).

⁴ See 6/5/09 Massinger Depo. (GST-3672).

⁵ Affidavit of Bernard F. Massinger (May 28, 2009), at Shein 01357 (Shook & Fletcher Trust Claim) (GST-3691);

Affidavit of Bernard F. Massinger (May 28, 2009), at Shein 00787 (Fibreboard Trust Claim) (GST-3686).

⁶ *Id.*

The firm that referred the case to Shein Law Center—Early Lucarelli—filed Mr. Massinger’s Trust claims.⁷ Mr. Shein testified that he had an understanding with the Early firm that they would not file Trust claims before Mr. Massinger’s trial was concluded.⁸ Shein testified that his firm has a practice of delaying Trust claims until after trial in order to prevent Trusts from being added to the verdict form.⁹ But contrary to the understanding with Mr. Shein, the Early firm filed two Trust claims, with the Fibreboard and USG Trusts—the Fibreboard claim supported by the affidavit attesting to Air Force exposure—before the trial against Garlock.¹⁰ Later the Early firm withdrew those claims—the claim with the USG Trust *after* the Trust had already approved and agreed to pay Mr. Massinger’s claim.¹¹ The exposures evidenced by the USG and Fibreboard Trust claims were never disclosed to Garlock in the tort litigation, in violation of Philadelphia discovery rules.

Overall, Mr. Massinger’s attorneys filed seven Trust claims and four ballots based on exposures not identified to Garlock during discovery, for a total of eleven unidentified exposures, including refiling the Fibreboard and USG Trust claims withdrawn during the tort litigation.¹² Overall, six Trust claims and ballots based on exposures not identified in tort discovery were filed *before* Garlock settled the case.

⁷ Shein Depo. Tr. at 34 (GST-1030).

⁸ *Id.* at 137:2-9.

⁹ *Id.* at 43:20-44:23.

¹⁰ See Data concerning Mr. Massinger received from Delaware Claims Processing Facility, LLC pursuant to Court-ordered subpoena (GST-1600).

¹¹ See *id.*

¹² See Summary Chart of Massinger Filings *infra*.

Summary Chart of Massinger Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ASARCO		Yes (7/27/09) ¹	
Babcock & Wilcox	Yes (1/7/10) ²		
Combustion Engineering	Yes ³		
Eagle Picher	Yes (10/5/11) ⁴		
Federal Mogul (Flexitallic)	Yes (11/3/11) ⁵		
Fibreboard	Yes (6/17/09 ⁶ , 1/11/10 ⁷)		
DII (Halliburton)	Yes (1/7/10) ⁸		
Manville	Yes (2/16/11) ⁹		
Owens Corning	Yes (1/15/10) ¹⁰		
Pacor	Yes (2/16/11) ¹¹		
Pittsburgh Corning		Yes (10/6/09) ¹²	
Quigley		Yes (6/9/06) ¹³	
Raybestos	Yes (1/10/11) ¹⁴		
Shook & Fletcher	Yes ¹⁵		
USG	Yes (6/11/09 ¹⁶ , 1/7/10 ¹⁷)		
W.R. Grace		Yes (5/19/09) ¹⁸	

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Massinger 2009 ASARCO Ballot at GST-EST-0555916 & GST-EST-0555923 (GST-3674 & GST-3675).

² Massinger B&W Trust Claim at Shein 00075 (GST-3681).

³ Massinger Combustion Trust Claim at Shein 00129 (GST-3682).

⁴ Massinger EPI Trust Claim at Shein 00673 (GST-3684).

⁵ Massinger FM Trust Claim at Shein 00683 (GST-3685).

⁶ See Data concerning Mr. Massinger received from Delaware Claims Processing Facility, LLC pursuant to Court-ordered subpoena (GST-1600).

⁷ Massinger FB Trust Claim at Shein 00770 (GST-3686).

⁸ Massinger HAL Trust Claim at Shein 00602 (GST-3683).

⁹ Massinger Manville Trust Claim at Shein 01080 (GST-3687).

¹⁰ Massinger OC Trust Claim at Shein 01089 (GST-3688).

¹¹ Massinger Pacor Trust Claim at Shein 01193 (GST-3689).

¹² Massinger 2009 PCC Ballot at GST-EST-0556169 & GST-EST-0556170 (GST-3676 & GST-3677)

¹³ Massinger 2006 Quigley Ballot at GST-EST-0556191 (GST-3678).

¹⁴ Massinger Raybestos Trust Claim at Shein 01338 (GST-3690).

¹⁵ Massinger Shook & Fletcher Trust Claim at Shein 01351 (GST-3691).

¹⁶ See Data concerning Mr. Massinger received from Delaware Claims Processing Facility, LLC pursuant to Court-ordered subpoena (GST-1600).

¹⁷ Massinger USG Trust Claim at Shein 01417 (GST-3692).

¹⁸ Massinger WRG Ballot at GST-EST-0556225 & GST-EST-0556226 (GST-3679 & GST-3680).

5. John Phillips—Williams Kherkher—Texas

Mr. Phillips was represented by the same law firm that represented Mr. Torres, and he obtained the largest pre-verdict settlement from Garlock in its history: \$2.5 million. He claimed that his only exposure to asbestos occurred as a young man during three summers working as a gasket cutter, where he only cut Garlock crocidolite gaskets as well as Johns-Manville gaskets.¹ He and his attorney disclosed no other exposures to asbestos during his tort case, including no other exposures to bankrupt products, and they claimed that the standard Texas interrogatory regarding Trust claims “made or anticipated to be made” was “Not applicable.”²

Before Garlock settled the case, however, Mr. Phillips’ attorneys filed a ballot for him in the ASARCO bankruptcy, indicating, among other things, that he had exposure for which Capco, an asbestos cement pipe manufacturer, was responsible.³ In addition, after Garlock settled, Mr. Phillips and his attorneys asserted fourteen Trust claims for which exposures were never identified (in addition to a Manville claim).⁴ In four of those claims, Mr. Phillips requested Individual Review, an indication that his attorneys believed he had a particularly strong claim.⁵ Exposure to any of these products was not consistent in any way with the exposure story Mr. Phillips told Garlock in the tort system.

¹ Plaintiffs’ Thirteenth Supplemental Responses to Master Interrogatories, Requests for Production and Requests for Disclosure at 11-12 (Feb. 19, 2009) (GST-3957).

² See, e.g., *id.* at 14, 21-24, 48-49.

³ Phillips 2008 ASARCO Ballot at GST-EST-0555781 & GST-EST-0555790 (GST-3976 & GST-3977); Phillips 2009 ASARCO Ballot at GST-EST-0555932 (GST-3978).

⁴ See Summary Chart of Phillips Filings *infra*.

⁵ See *id.* (Halliburton, Kaiser Aluminum, Plibrico, and USG Trust claims).

Summary Chart of Phillips Filings ¹			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
Armstrong World Industries	Yes (5/21/10)		
ARTRA	Yes (7/7/10)		
ASARCO	Yes (9/5/12)	Yes (2008 ² , 2009 ³)	
Babcock & Wilcox	Yes (7/3/09)		
Combustion Engineering	Yes (2/26/10)		
Congoleum	Yes (9/28/11)		
Fibreboard	Yes (5/27/10)		
DII (Halliburton)	Yes (6/2/10)		
Kaiser Aluminum	Yes (6/8/10)		
Keene	Yes (4/14/09)		
Manville	Yes (8/11/09)		
Owens Corning	Yes (6/1/10)		
Plibrico	Yes (2/1/10)		
US Minerals	Yes (12/15/11)		
USG	Yes (6/2/10)		

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ For Phillips' Trust claims, see Affidavit of Charles D. Finley, *Garlock Sealing Technologies LLC et al. v. Chandler et al. (In re Garlock Sealing Technologies LLC, et al.)*, No. 12-03137 (Bankr. W.D.N.C. Dec. 5, 2012) (Docket No. 42), Ex. E. (GST-7056) (containing claim forms against the ARTRA, Armstrong World Industries, Babcock & Wilcox, Combustion Engineering, Congoleum, Fibreboard, Halliburton, Kaiser Aluminum, Keene, Owens Corning, Plibrico, US Minerals, and USG Trusts), and Supplemental Affidavit of Charles D. Finley, *Garlock Sealing Technologies LLC et al. v. Chandler et al. (In re Garlock Sealing Technologies LLC, et al.)*, No. 12-03137 (Bankr. W.D.N.C. Jan. 21, 2013) (Docket No. 54), Ex. A, Ex. B (GST-7056) (attaching Manville and ASARCO Trust claim forms).

² Phillips 2008 ASARCO Ballot at GST-EST-0555781 & GST-EST-0555790 (GST-3976 & GST-3977).

³ Phillips 2009 ASARCO Ballot at GST-EST-0555932 (GST-3978).

6. Vincent Golini—Shein Law Center—Philadelphia, Pennsylvania

Garlock settled Mr. Golini's mesothelioma claim for \$250,000 in 2010, at the same time as the *Massinger* settlement. In response to standard interrogatories requiring him to identify all products to which he was exposed, Mr. Golini and his attorneys identified no bankrupt companies.¹ At Mr. Golini's deposition, his attorney asked him about the condition of the pipe covering on ships where he worked, and he testified that "[t]he condition on ships was always wonderful. There was a cast and everything was painted." When asked "Did you ever observe these miles of pipe covering to be dusty or flaky?" he testified "No."² The only bankrupt company he remembered at his deposition was Johns-Manville, but in response to his attorney's question about whether he associated that name with any particular product, he said "no."³ Under questioning by defendants' lawyers, Mr. Golini testified he either never saw or never encountered at the shipyard where he worked products manufactured by Owens Corning (Kaylo), Fibreboard, Armstrong, and Eagle Picher.⁴ He also testified that he had never heard of Worthington pumps.⁵

In fact, before filing suit against Garlock—and months before his deposition—Mr. Golini had already signed fourteen sworn statements attesting "subject to the penalties of perjury" that during his employment he "frequently and regularly worked in close proximity" to workers manipulating various asbestos-containing products for which bankrupts are responsible, which created asbestos dust that he breathed.⁶ Five of the sworn statements attested to frequent, regular,

¹ Plaintiffs' Answers to Asbestos Claims Facility Defendants' General Interrogatories—Sets I and II, at 3 (July 29, 2009) (requiring Mr. Golini to, among other things, "List, by type, brand and/or trade name, and manufacturer, every asbestos-containing product to which you believe you were exposed.") (GST-2847).

² 8/12/09 Golini Depo. Tr. at 148-49 (GST-2841); *see also* 8/12/09 Golini Depo. Tr. at 386-87 (GST-2839).

³ 8/12/09 Golini Depo. Tr. at 148-49 (GST-2841).

⁴ 8/10/09 Golini Depo. Tr. at 32-35 (GST-2842).

⁵ 8/11/09 Golini Depo. Tr. at 249 (GST-2840).

⁶ Affidavit of Vincent Golini (May 19, 2009), at Shein 00054 (ARTRA Triple Duty Joint Compound) (GST-2864); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01901 (AWI Asbestos-Containing Products) (GST-2887); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01923 (B&W Boilers) (GST-2888); Sworn

and proximate exposure to particular products manufactured by Fibreboard (Pabco pipe covering), Armstrong (pipe covering), Owens Corning (Kaylo pipe covering), Eagle Picher (Super 66 and One-Cote cement), and Worthington (pumps), contradicting Mr. Golini's later deposition testimony that he lacked any knowledge about those products.⁷ And despite Mr. Golini's testimony about the "wonderful" condition of the pipe covering he saw on ships, several of the products to which Mr. Golini was regularly, frequently, and proximately exposed were pipe covering, including Pabco, Kaylo, and Philip Carey pipe covering.⁸ The sworn statements attested to his exposure to other friable products as well, including cement and block.

Mr. Shein testified that he would not have expected these sworn statements to have been shared with the attorney who prepared Mr. Golini for deposition, presented him, and questioned him about his exposures there, because "our goal is to maximize a client's recovery . . . and in order to do that, what we focus on for the deposition is the viable, non-bankrupt companies. That's our job, okay. Our goal is to do our job on behalf of our clients, okay, not to do the

Statement of Vincent Golini (May 16, 2009), at Shein 00116 (Philip Carey pipe covering (Celotex)) (GST-2866); Affidavit of Vincent Golini (May 19, 2009), at Shein 00180 (Combustion Asbestos Products) (GST-2867); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 00653 (Worthington Pumps (HAL)) (GST-2868); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 00672 (EPI Super 66 and One-Cote Asbestos Cement) (GST-2870); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01075 (Kaiser Asbestos Refractories Products) (GST-2874); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01087 (NGC Asbestos Joint Compound and Plaster) (GST-2876); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01163 (Pabco Asbestos pipe covering (FB)) (GST-2877); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01192 (Kaylo pipe covering (OC)) (GST-2878); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01329 (Plibrico Asbestos Refractories) (GST-2881); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01383 (Harbison Walker Asbestos Refractories) (GST-2884); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01463 (USG Asbestos Joint Compound) (GST-2885).

⁷ Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01901 (AWI Asbestos-Containing Products) (GST-2887); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 00653 (Worthington Pumps (HAL)) (GST-2868); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 00672 (EPI Super 66 and One-Cote Asbestos Cement) (GST-2870); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01163 (Pabco Asbestos pipe covering (FB)) (GST-2877); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01192 (Kaylo pipe covering (OC)) (GST-2878).

⁸ Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01163 (Pabco Asbestos pipe covering (FB)) (GST-2877); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 01192 (Kaylo pipe covering (OC)) (GST-2878); Sworn Statement of Vincent Golini (May 16, 2009), at Shein 00116 (Philip Carey pipe covering (Celotex)) (GST-2866).

defendants' job for them."⁹ After identifying no exposures to bankrupt products during discovery, Mr. Golini's attorneys eventually filed twenty Trust claims and five ballots on his behalf, for a total of twenty-five unidentified exposures.¹⁰

⁹ Shein Depo. Tr. at 64:11-65:16 (GST-1030).

¹⁰ See Summary Chart of Golini Filings *infra*.

Summary Chart of Golini Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
Armstrong World Industries	Yes (6/14/10) ¹ , 3/21/12 ²		
ARTRA	Yes ³		
ASARCO		Yes (7/27/09) ⁴	
Babcock & Wilcox	Yes (6/14/10) ⁵		
Celotex	Yes ⁶		
Combustion Engineering	Yes ⁷		
DII (Halliburton)	Yes (6/14/10) ⁸		
DII (Harbison Walker)	Yes (6/14/10) ⁹		
Eagle Picher	Yes (6/15/10) ¹⁰		
Federal Mogul (Flexitallic)	Yes (11/12/10) ¹¹		
Federal Mogul (T&N)	Yes (11/12/10) ¹²		
Fibreboard	Yes (6/14/10) ¹³		
H.K. Porter	Yes ¹⁴		
Hercules		Yes (11/6/09) ¹⁵	
Kaiser	Yes ¹⁶		
Manville	Yes (11/29/11) ¹⁷		
National Gypsum	Yes (6/15/10) ¹⁸		
Owens Corning	Yes (6/14/10) ¹⁹		
Pacor	Yes (6/14/10) ²⁰		
Pittsburgh Corning		Yes (10/6/09) ²¹	
Pfibrico	Yes ²²		
Quigley		Yes (10/25/12) ²³	
Raybestos	Yes (12/3/10) ²⁴		
USG	Yes (6/14/10) ²⁵		
W.R. Grace		Yes (5/19/09) ²⁶	

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ See Data concerning Mr. Golini received from Delaware Claims Processing Facility, LLC pursuant to Court-ordered subpoena (GST-1600).

² Golini AWI Trust Claim at Shein 01888 (GST-2887).

³ Golini ARTRA Trust Claim at Shein 00036 (GST-2864).

⁴ Golini 2009 ASARCO Ballot at Shein 00060 (GST-2865).

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- ⁵ Golini B&W Trust Claim at Shein 01902 (GST-2888).
⁶ Golini Celotex Trust Claim at Shein 00104 (GST-2866).
⁷ Golini Combustion Trust Claim at Shein 00162 (GST-2867).
⁸ Golini HAL Trust Claim at Shein 00628 (GST-2868).
⁹ Golini IIW Trust Claim at Shein 01358 (GST-2884).
¹⁰ Golini EPI Trust Claim at Shein 00668 (GST-2870).
¹¹ Golini FM (Flex) Trust Claim at Shein 00702 (GST-2871).
¹² Golini FM (T&N) Trust Claim at Shein 00736 (GST-2872).
¹³ Golini FB Trust Claim at Shein 01135 (GST-2877).
¹⁴ Golini HKP Trust Claim at Shein 01037 (GST-2873).
¹⁵ Golini Hercules Ballot at Shein 01510 (GST-1994).
¹⁶ Golini Kaiser Trust Claim at Shein 01060 (GST-2874).
¹⁷ Golini Manville Trust Claim at Shein 01084 (GST-2875).
¹⁸ Golini NGC Trust Claim at Shein 01086 (GST-2876).
¹⁹ Golini OC Trust Claim at Shein 01164 (GST-2878).
²⁰ Golini Pacor Trust Claim at Shein 01195 (GST-2879).
²¹ Golini 2009 PCC Ballot at Shein 01202 (GST-1987).
²² Golini Plibrico Trust Claim at Shein 01314 (GST-2881).
²³ Golini 2012 Quigley Ballot at Shein 01335 (GST-1989).
²⁴ Golini Raybestos Trust Claim at Shein 01347 (GST-2883).
²⁵ Golini USG Trust Claim at Shein 01436 (GST-2881).
²⁶ Golini WRG Ballot at GST-EST-0556215 & GST-EST-0556216 (GST-2862 & GST-2863).

7. Charles White—Simon Eddins—Texas

Garlock settled Mr. White's mesothelioma claim for \$250,000 in 2006, one month before trial was set to begin and after extensive discovery. In response to Texas standard interrogatories requiring Mr. White to list all products to which he was exposed, including products manufactured by bankrupts, Mr. White and his attorneys identified no bankrupts represented by 524(g) Trusts.¹ At his deposition, Mr. White identified only one product for which a 524(g) Trust was responsible (Worthington pumps).² Mr. White testified that he spent his time at the shipyard in a machine shop where he was brought equipment from which he removed gaskets³ and testified he never went aboard ships or saw asbestos insulation being installed or removed.⁴ He also testified that he was not exposed to asbestos during his year of Coast Guard service.⁵

After Garlock settled the case, the Early firm, which referred the case to Simon Eddins, filed twenty-two Trust claims, and a third law firm filed two additional Trust claims. None of the exposures underlying twenty-two of the twenty-four claims had been identified in discovery.⁶ Four of the claims with unidentified exposures were supported by sworn statements from Mr. White attesting to his personal knowledge of exposures to specific asbestos-containing products manufactured by bankrupts, which created dust that he inhaled.⁷

Some of the claims were based on sworn statements from Mr. White attesting to his extensive asbestos exposure in the Coast Guard, directly contradicting his deposition testimony that he was not exposed to asbestos while in the Coast Guard. In the affidavit supporting the

¹ Plaintiff's Answers to Master Discovery Requests to All Defendants in All Asbestos-Related Personal Injury and Death Cases Filed in Harris County and Responses to All Defendants' Rule 194 Requests for Disclosure at 5-7, 8-9, 14-16, Ex. 4 (July 31, 2006) (GST-5655).

² See, e.g., 8/11/06 White Depo. Tr. at 29:3-21 (GST-5612).

³ *Id.* at 24:23-25:12, 26:1-11.

⁴ *Id.* at 112:7-113:6.

⁵ *Id.* at 168:3-7.

⁶ See Summary Chart of White Filings *infra*.

⁷ Affidavit of Charles C. White (Sept. 25, 2007), at Simon 27492 (AWI) (GST-5980); Affidavit of Charles C. White (Sept. 25, 2007), at Simon 27639 (USG) (GST-5989); Affidavit of Charles C. White (Sept. 25, 2007), at Simon 28012 (NGC) (GST-5998); Affidavit of Charles White (Oct. 27, 2008), at Simon 27627 (TILAN) (GST-5988).

Trust claims, he swore, “As a Fire Control/Radar Officer aboard these ships, I was exposed to asbestos containing materials such as, but not limited to, fireproofing, boilers, pipe covering, block, cement, gaskets, insulation and refractory, while working with and in the vicinity of insulators, repairmen and other tradesmen.”⁸

Most remarkable of all were two claims supported by declarations from Mr. White’s wife after his death. Directly contradicting Mr. White’s testimony that he never worked on ships at the shipyard, she attested under penalty of perjury that he had worked for extended periods of time on two ships (the USS Mountrail and USS Sea Lion).⁹ On the Mountrail, according to his wife’s personal knowledge “from extensive discussions with my husband about his work,” he “observed shipboard activities with and around insulation materials, including but not limited to pipe insulation” and was with and around tradesmen who were “installing and tearing out asbestos-containing products, including but not limited to pipe insulation.”¹⁰ His wife attested that when Mr. White was diagnosed, he “indicated to me that he believed that his exposure to pipe insulation while on the USS Mountrail APA-213 while it was at the Norfolk Naval Shipyard in Norfolk, VA was contributory to his Mesothelioma.”¹¹ She also attested that on the Sea Lion, Mr. White worked near boilers during “mixing, installation and chipping of refractory products, scraping of gaskets and handling and cleaning of other asbestos-containing boiler materials,” and was also frequently around boilermakers who “always had dirty and dusty work clothes.”¹² Here too she indicated that “I believe Decedent Charles C. White’s exposure to asbestos while

⁸ Affidavit of Charles C. White (Aug., 12, 2008), at Simon 27505 (B&W) (GST-5981); Affidavit of Charles C. White (Aug., 12, 2008), at Simon 27977 (Bartells) (GST-5994).

⁹ Declaration of Barbara Lorton (Apr. 1, 2010), at Simon 27923 (Western) (GST-5991); Declaration of Barbara Lorton (June 18, 2009), at Simon 27822 (Thorpe) (GST-5990).

¹⁰ Declaration of Barbara Lorton (Apr. 1, 2010), at Simon 27923 (Western) (GST-5991).

¹¹ *Id.*

¹² Declaration of Barbara Lorton (June 18, 2009), at Simon 27822 (Thorpe) (GST-5990).

working on the USS Sea Lion at Norfolk Naval Shipyard in the boiler room was contributory to his Mesothelioma.”¹³ None of these exposures were disclosed to Garlock in his tort case.

¹³ *Id.*

Summary Chart for White Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ABB Lummus	Yes ¹		
Armstrong World Industries	Yes (10/4/07) ²		
ARTRA	Yes ³		
ASARCO	Yes ⁴		
Babcock & Wilcox	Yes (8/20/08) ⁵		
C.E. Thurston	Yes (1/22/08) ⁶		
Celotex	Yes ⁷		
DII (Halliburton)	Yes (5/11/07) ⁸		
E.J. Bartells	Yes ⁹		
Eagle Picher	Yes ¹⁰		
Federal Mogul (Flexitallic)	Yes (8/17/12) ¹¹		
Fibreboard	Yes (9/20/07) ¹²		
G-I Holdings (GAF)	Yes ¹³		
H.K. Porter	Yes ¹⁴		
J.T. Thorpe	Yes ¹⁵		
Keene	Yes (11/19/08) ¹⁶		
Manville	Yes (5/8/07) ¹⁷		
National Gypsum	Yes (10/1/07) ¹⁸		
Owens Corning	Yes (8/29/07) ¹⁹		
Porter Hayden	Yes ²⁰		
Raybestos	Yes (12/7/10) ²¹		
THAN	Yes ²²		
USG	Yes (10/4/07) ²³		
Western Asbestos	Yes ²⁴		

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ White Lummus Trust Claim at Simon 27429 (GST-5977).

² White AWI Trust Claim at Simon 27481 (GST-5980).

³ White ARTRA Trust Claim at Simon 27445 (GST-5978).

⁴ White ASARCO Trust Claim at Simon 27461 (GST-5979).

⁵ White B&W Trust Claim at Simon 27493 (GST-5981).

⁶ White Thurston Trust Claim at Simon 28037 (GST-6000).

⁷ White Celotex Trust Claim at Simon 27957 (GST-5993).

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- ⁸ White IIAL Trust Claim at Simon 27506 (GST-5982).
⁹ White Bartells Trust Claim at Simon 27969 (GST-5994).
¹⁰ White EPI Trust Claim at Simon 27979 (GST-5995).
¹¹ White FM (Flex) Trust Claim at Simon 27545 (GST-5984).
¹² White FB Trust Claim at Simon 27523 (GST-5983).
¹³ White GAF Trust Claim at Simon 27561 (GST-5985).
¹⁴ White HKP Trust Claim at Simon 27580 (GST-5986).
¹⁵ White Thorpe Trust Claim at Simon 27747 (GST-5990).
¹⁶ White Keene Trust Claim at Simon 27995 (GST-5997).
¹⁷ White Manville Trust Claim at Simon 27993 (GST-5996).
¹⁸ White NGC Trust Claim at Simon 27999 (GST-5998).
¹⁹ White OC Trust Claim at Simon 28013 (GST-5999).
²⁰ White P11 Trust Claim at Simon 27594 (GST-5987).
²¹ White Raybestos Trust Claim at Simon 27953 (GST-5992).
²² White TILAN Trust Claim at Simon 27610 (GST-5988).
²³ White USG Trust Claim at Simon 27628 (GST-5989).
²⁴ White Western Trust Claim at Simon 27848 (GST-5991).

8. Howard Ornstein—Simon Eddins—Los Angeles, California

Garlock settled Mr. Ornstein's mesothelioma claim for \$450,000 in 2008 according to Garlock's database. Mr. Ornstein alleged he was exposed to Garlock gaskets while working as an electrician aboard Navy ships, where he mostly performed maintenance work. In response to standard discovery requiring Mr. Ornstein to disclose all his exposures to asbestos, Mr. Ornstein and his attorneys disclosed no exposures to products manufactured by bankrupt entities.¹ At his deposition, Mr. Ornstein claimed he never saw anyone installing or removing pipe insulation during the overhaul of the USS Estes² and that he never saw a boiler while he was in the Navy.³ When asked whether he ever saw anything on the USS Estes manufactured by a company called Worthington, he testified, "No. I don't recall that name."⁴

After Garlock settled the case, Mr. Ornstein and his attorneys at Simon Eddins filed eleven Trust claims, all based on exposures not identified in his tort case.⁵ Seven of the claims were based on declarations executed by Mr. Ornstein under penalty of perjury attesting to his personal knowledge of exposures to specific products, including numerous insulation products such as Armstrong 85% Magnesia Pipe Covering and Block, Eagle Picher 85% Magnesia Pipe Covering, Keene Pipe Covering, Pabco 85% Magnesia Pipe Covering, and Kaylo Pipe Covering.⁶ Mr. Ornstein swore, under penalty of perjury and upon personal knowledge, that on

¹ Plaintiffs' Responses to General Order Standard Interrogatories Propounded by Defendants at 10-13, Ex. A (May 23, 2008) (GST-3741).

² 6/3/08 Ornstein Depo. Tr. at 228-30, 237 (GST-3832); 6/5/08 Ornstein Depo. Tr. at 525-27 (GST-3834).

³ 6/2/08 Ornstein Depo. Tr. at 39, 101 (GST-3831); 6/3/08 Ornstein Depo. Tr. at 107, 152 (GST-3832); 6/4/08 Ornstein Depo. Tr. at 321-22, 363-64 (GST-3833); 6/5/08 Ornstein Depo. Tr. at 527 (GST-3834).

⁴ 6/4/08 Ornstein Depo. Tr. at 299 (GST-3833).

⁵ See Summary Chart of Ornstein Filings *infra*.

⁶ Declaration of Howard Ornstein (June 18, 2009), at Simon 28055 (Armstrong 85% Magnesia Pipe Covering and Block and Armstrong Hi-Temp Pipe Covering) (GST-3873); Declaration of Howard Ornstein (Mar. 12, 2009), at Simon 28140 (same) (GST-3876); Declaration of Howard Ornstein (March 12, 2009), at Simon 28372 (Worthington Pumps) (GST-3880); Declaration of Howard Ornstein (Mar. 12, 2009), at Simon 28226 (Combustion Boilers) (GST-3878); Declaration of Howard Ornstein (Mar. 12, 2009), at Simon 28488 (Eagle Picher 85% Magnesia Pipe Covering) (GST-3882); Declaration of Howard Ornstein (Mar. 12, 2009), at Simon 28674 (HKP Asbestos Cloth) (GST-3885); Declaration of Howard Ornstein (Mar. 12, 2009), at Simon 28767 (Keene Pipe Covering) (GST-3888);

board the ships he “would remove and replace insulation,” including pipe insulation such as Armstrong 85% Magnesia Pipe Covering and Block and Armstrong Hi-Temp pipe covering.⁷ This statement directly contradicted his testimony in the tort case that he had never even *seen* anyone install or remove pipe insulation, much less install and remove it himself as he swore in this declaration.

Declaration of Howard Ornstein (Mar. 12, 2009), at Simon 28863 (Pabco 85% Magnesia Pipe Covering and Kaylo Pipe Covering) (GST-3890).

⁷ Declaration of Howard Ornstein (June 18, 2009), at Simon 28055 (GST-3873).

Summary Chart of Ornstein Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ACandS	Yes ¹		
Amatex	Yes ²		
Armstrong World Industries	Yes (3/26/09) ³		
Combustion Engineering	Yes ⁴		
DII (Halliburton)	Yes (3/26/09) ⁵		
Eagle Picher	Yes (3/26/09) ⁶		
Fibreboard	Yes (3/26/09) ⁷		
H.K. Porter	Yes ⁸		
Keene	Yes (3/26/09) ⁹		
Owens Corning	Yes (1/16/09) ¹⁰		
Thorpe Insulation	Yes ¹¹		

Note: Filing date of document, when known, is in parentheses.

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- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Ornstein AC&S Trust Claim at Simon 28039 (GST-3872).

² Ornstein Amatex Trust Claim at Simon 28084 (GST-3874).

³ Ornstein AWI Trust Claim at Simon 28125 (GST-3875).

⁴ Ornstein Combustion Trust Claim at Simon 28208 (GST-3878).

⁵ Ornstein HAL Trust Claim at Simon 28355 (GST-3879).

⁶ Ornstein EPI Trust Claim at Simon 28485 (GST-3881).

⁷ Ornstein FB Trust Claim at Simon 28573. (GST-3883).

⁸ Ornstein HKP Trust Claim at Simon 28659 (GST-3884).

⁹ Ornstein Keene Trust Claim at Simon 28765 (GST-3887).

¹⁰ Ornstein OC Trust Claim at Simon 28842 (GST-3889).

¹¹ Ornstein Thorpe Ins. Trust Claim at Simon 28865 (GST-3891).

9. Robert Reed—Simon Eddins—Los Angeles, California

Garlock settled Mr. Reed's mesothelioma claim for \$400,000 in 2008. Mr. Reed and his attorneys identified no bankrupt companies in response to standard interrogatories requiring him to identify all his exposures to asbestos.¹ He identified only solvent manufacturers, such as Garlock.²

After Garlock settled, Mr. Reed and his attorneys filed Trust claims and ballots based on fourteen exposures not identified to Garlock.³ Several of the claims were based on affidavits executed by Mr. Reed's wife, son, and attorney, attesting to his exposure to particular asbestos-containing products that were never identified in discovery, despite the fact that the son verified interrogatories submitted after Mr. Reed passed away.⁴

¹ Plaintiff Robert G. Reed's Amended Responses to General Order Standard Interrogatories Propounded by Defendants at 11-14, Ex. A (Feb. 1, 2007) (GST-4070).

² *See id.*

³ *See* Summary Chart of Reed Filings *infra*.

⁴ Plaintiff Robert Reed II's Response to General Order Standard Interrogatories—Wrongful Death at 54 (Feb. 5, 2008) (GST-4072); Affidavit of Mathilde Reed (Apr. 27, 2011), at Simon 27291 (ARTRA) (GST-4179); Affidavit of Mathilde Reed (June 11, 2012), at Simon 27349 (Congoleum) (GST-4182); Affidavit of Robert Reed II (Sept. 18, 2012), at Simon 27362 (FM-Ferodo) (GST-4183); Affidavit of Robert Reed II (Mar. 7, 2011), at Simon 27379 (GAF) (GST-4184); Affidavit of Mathilde Reed (Oct. 14, 2008), at Simon 27428 (USG) (GST-4187); Declaration of Mathilde Reed (Aug. 20, 2009), at Simon 27725 (Western) (GST-4188);

Summary Chart of Reed Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ARTRA	Yes ¹		
ASARCO	Yes ²		
Babcock & Wilcox	Yes (10/9/09) ³		
Celotex	Yes ⁴		
Combustion Engineering	Yes ⁵		
Congoleum	Yes ⁶		
DII (Halliburton)	Yes (6/23/08) ⁷		
Eagle Picher	Yes (6/18/08) ⁸		
Federal Mogul (Ferodo)	Yes (10/11/12) ⁹		
G-I Holdings (GAF)	Yes ¹⁰		
Manville	Yes (6/18/08) ¹¹		
Owens Corning	Yes (6/23/08) ¹²		
Raybestos	Yes (1/15/11) ¹³		
USG	Yes (10/24/08) ¹⁴		
Western Asbestos	Yes (8/26/09) ¹⁵		

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Reed ARTRA Trust Claim at Simon 27274 (GST-4179).
² Reed ASARCO Trust Claim at Simon 27253 (GST-4178).
³ Reed B&W Trust Claim at Simon 27292 (GST-4180).
⁴ Reed Celotex Trust Claim at Simon 27931 (GST-4189).
⁵ Reed Combustion Trust Claim at Simon 27307 (GST-4181).
⁶ Reed Congoleum Trust Claim at Simon 27330 (GST-4182).
⁷ Reed HAL Trust Claim at Simon 27380 (GST-4185).
⁸ Reed EPI Trust Claim at Simon 27938 (GST-4190).
⁹ Reed FM (Ferodo) Trust Claim at Simon 27350 (GST-4183).
¹⁰ Reed GAF Trust Claim at Simon 27363 (GST-4184).
¹¹ Reed Manville Trust Claim at Simon 27946 (GST-4191).
¹² Reed OC Trust Claim at Simon 27399 (GST-4186).
¹³ Reed Raybestos Trust Claim at Simon 27947 (GST-4192).
¹⁴ Reed USG Trust Claim at Simon 27417 (GST-4187).
¹⁵ Reed Western Trust Claim at Simon 27660 (GST-4188).

10. John Brennan—Shein Law Center—Philadelphia, Pennsylvania

Garlock settled Mr. Brennan's mesothelioma claim for \$250,000 in 2010. Mr. Brennan and his attorneys filed Trust claims and ballots based on twenty exposures not identified to Garlock: fourteen Trust claims and six ballots.¹ At least five of the ballots were filed before Garlock settled the case, and the exposures were never identified to Garlock.²

¹ See Plaintiffs' Answers to Asbestos Claims Facility Defendants' General Interrogatories—Sets I and II at 13-14, Ex. A (Sept. 11, 2008) (GST-1938); Summary Chart of Brennan Filings *infra*.

² For timing of claims, see Summary Chart of Brennan Filings *infra*.

Summary Chart of Brennan Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
Armstrong World Industries	Yes (6/10/10) ¹		
ASARCO		Yes (7/27/09) ²	
Babcock & Wilcox	Yes (6/10/10) ³		
Celotex	Yes ⁴		
Combustion Engineering	Yes ⁵		
Eagle Picher	Yes (6/11/10) ⁶		
Fibreboard	Yes (6/10/10) ⁷		
G-I Holdings (GAF)		Yes (1/19/09) ⁸	
DII (Halliburton)	Yes (6/10/10) ⁹		
DII (Harbison Walker)	Yes (6/10/10) ¹⁰		
Hercules Chemical		Yes (11/6/09) ¹¹	
Manville	Yes (4/12/10) ¹²		
National Gypsum	Yes (6/11/10) ¹³		
Owens Corning	Yes (6/10/10) ¹⁴		
Pacor	Yes (4/12/10) ¹⁵		
Pittsburgh Corning		Yes (10/6/09) ¹⁶	
Quigley		Yes (10/25/12) ¹⁷	
Raybestos	Yes (12/6/10) ¹⁸		
USG	Yes (6/10/10) ¹⁹		
W.R. Grace		Yes (5/19/09) ²⁰	

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Brennan AWI Trust Claim at Shein 00064 (GST-1976).

² Brennan 2009 ASARCO Ballot at Shein 00060 (GST-1975).

³ Brennan B&W Trust Claim at Shein 00093 (GST-1977).

⁴ Brennan Celotex Trust Claim at Shein 00117 (GST-1978).

⁵ Brennan Combustion Trust Claim at Shein 00181 (GST-1979).

⁶ Brennan EPI Trust Claim at Shein 00665 (GST-1980).

⁷ Brennan FB Trust Claim at Shein 01122 (GST-1985).

⁸ Brennan GAF Ballot at Shein 00792 (GST-1981).

⁹ See Data concerning Mr. Brennan received from Delaware Claims Processing Facility, I.I.C. pursuant to Court-ordered subpoena (GST-1600).

¹⁰ Brennan HW Trust Claim at Shein 01401 (GST-1992).

¹¹ Brennan Hercules Ballot at Shein 01510 (GST-1994).

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- ¹² Brennan Manville Trust Claim at Shein 01085 (GST-1982).
¹³ Brennan NGC Trust Claim at Shein 01088 9GST-1983).
¹⁴ Brennan OC Trust Claim at Shein 01109 (GST-1984).
¹⁵ Brennan Pacor Trust Claim at Shein 01197 (GST-1986).
¹⁶ Brennan 2009 PCC Ballot at Shein 01202 (GST-1987).
¹⁷ Brennan 2012 Quigley Ballot at Shein 01335 (GST-1989).
¹⁸ Brennan Raybestos Trust Claim at Shein 01349 (GST-1990).
¹⁹ Brennan USG Trust Claim at Shein 01464 (GST-1993).
²⁰ Brennan WRG Ballot at GST-EST-0556205 (GST-1973).

11. Robert Flynn—Belluck & Fox—New York, New York

Garlock settled Mr. Flynn's mesothelioma claim for \$150,000 in 2005—the first six-figure settlement that the Belluck & Fox firm obtained from Garlock. Mr. Flynn and his attorneys filed Trust claims, ballots, and 2019 statements based on twenty-three exposures not identified to Garlock, evidenced by fourteen Trust claims, seven ballots, and eight 2019 statements.¹

¹ See Plaintiffs' Response to Defendants' Interrogatories and Request for Production of Documents at 12-13, Chart A (Oct. 21, 2004) (GST-2761); Summary Chart of Flynn Filings *infra*.

Summary Chart of Flynn Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ABB Lummus	Yes (5/15/07) ¹		
Armstrong World Industries	Yes (12/23/10) ²		
Babcock & Wilcox	Yes (1/12/07) ³		
Celotex	Yes ⁴		
Combustion Engineering	Yes (9/21/06) ⁵		Yes (3/6/06) ⁶
DII (Halliburton)	Yes (9/3/07) ⁷		
Eagle Picher	Yes (2/16/07) ⁸	Yes (12/2/09) ⁹	
Fairchild Corp.		Yes (2006) ¹¹	
Fibreboard	Yes (2/23/11) ¹⁰	Yes (2009) ¹²	
Flintkote		Yes (1/7/09) ¹³	Yes (1/21/09) ¹⁴
G-I Holdings (GAF)			Yes (3/6/06) ¹⁵
GIT			
Kaiser Aluminum	Yes (5/25/07) ¹⁶		
Keene	Yes ¹⁷		
Manville	Yes ¹⁸		
NARCO			Yes (3/6/06) ¹⁹
Owens Corning	Yes (2/23/11) ²⁰		Yes (3/6/06) ²¹
Pittsburgh Corning		Yes (11/10/09) ²²	Yes (3/6/06) ²³
Porter Hayden	Yes ²⁴		
Quigley		Yes (11/12/12) ²⁵	
Raybestos	Yes (12/13/10) ²⁶		
UNR	Yes (2/21/07) ²⁷		
USG			Yes (3/6/06) ²⁸
W.R. Grace		Yes (5/18/09) ²⁹	Yes (5/14/09) ³⁰

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Flynn Lummus Trust Claim at Waters 02909 (GST-2777).

² Flynn AWI Trust Claim at Waters 02917 (GST-2778).

³ Flynn B&W Trust Claim at Waters 02948 (GST-2779).

⁴ Flynn Celotex Trust Claim at Waters 02984 (GST-2781).

⁵ Flynn Combustion Trust Claim at Waters 02976 (GST-2780).

⁶ 2nd Amended Combustion 2019 of Waters & Kraus at Waters 10597-10599 (GST-2792).

⁷ Flynn HAL Trust Claim at Waters 03059 (GST-2785).

⁸ Flynn EPI Trust Claim at Waters 03002 (GST-2782).

⁹ Flynn Fairchild Ballot at Waters 00048 (GST-2770).

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- ¹⁰ Flynn FB Trust Claim at Waters 03020 (GST-2783).
¹¹ Flynn FB Ballot at Waters 00078 (GST-2773).
¹² Flynn 2009 Flintkote Ballot at Waters 00053 (GST-2771).
¹³ Flynn GAF Ballot at Waters 00071 (GST-2772).
¹⁴ GAF 2019 of Waters & Kraus at Waters 00011-00013 (GST-2763).
¹⁵ 5th Amended GIT 2019 of Waters & Kraus at Waters 10639-10641 (GST-2794).
¹⁶ Flynn Kaiser Trust Claim at Waters 03097 (GST-2786).
¹⁷ Flynn Keene Trust Claim at Waters 03128 (GST-2787).
¹⁸ Flynn Manville Trust Claim at Waters 03041 (GST-2784).
¹⁹ 5th Amended NARCO 2019 of Waters & Kraus at Waters 10793-10795 (GST-2808).
²⁰ Flynn OC Trust Claim at Waters 03145 (GST-2788).
²¹ 5th Amended OC 2019 of Waters & Kraus at Waters 10903-10905 (GST-2822).
²² Flynn 2009 PCC Ballot at Waters 00089 (GST-2774).
²³ 5th Amended PCC 2019 of Waters & Kraus at Waters 10952-10954 (GST-2824).
²⁴ Flynn PII Trust Claim at Waters 03164 (GST-2789).
²⁵ Flynn 2012 Quigley Ballot at Waters 00096 (GST-2775).
²⁶ Flynn Raybestos Trust Claim at Waters 03194 (GST-2790).
²⁷ Flynn UNR Trust Claim at Waters 03204 (GST-2791).
²⁸ 5th Amended USG 2019 of Waters & Kraus at Waters 11089-11091 (GST-2838).
²⁹ Flynn WRG Ballot at Waters 00111 (GST-2776).
³⁰ 2nd Amended WRG 2019 of Waters & Kraus at Waters 00042-00044 (GST-2769).

12. Raymond Beltrami—Belluck & Fox—New York, New York

Garlock settled Mr. Beltrami's mesothelioma claim for \$200,000 in 2009, as part of the group of cases settled with *Homa* (*Beltrami* was the next case in the Belluck & Fox trial queue). Mr. Beltrami and his attorneys filed Trust claims and ballots based on twenty-five exposures not identified to Garlock, including seventeen Trust claims, five ballots, and five 2019 statements.¹ *Beltrami* was subject to the same NYC CMO provision requiring filing and disclosure of all Trust claims long before trial. Nine of the Trust claims and ballots were filed before Garlock settled the case, and neither they nor the underlying exposures were ever identified to Garlock.²

¹ See Plaintiffs' Response to Defendants' Fourth Amended Interrogatories and Request for Production of Documents at 11-13, Chart A (Apr. 3, 2008) (GST-1862); Summary Chart of Beltrami Filings *infra*.

² For timing, see Summary Chart of Beltrami Filings *infra*.

Summary Chart of Beltrami Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ACandS		Yes (3/20/08) ¹	
Armstrong World Industries	Yes (2/20/09) ²		
ASARCO		Yes (8/5/09) ³	
Babcock & Wilcox	Yes (1/23/09) ⁴		
Celotex	Yes (6/24/10) ⁵		
Combustion Engineering	Yes (7/30/08) ⁶		
Eagle Picher	Yes (6/24/10) ⁷		
Fibreboard	Yes (1/23/09) ⁸		
Flintkote		Yes (12/17/08) ⁹	Yes (10/2/12) ¹⁰
G-I Holdings (GAF)		Yes ¹¹	
GIT			Yes (10/2/12) ¹²
H.K. Porter	Yes ¹³		
DII (Halliburton)	Yes (5/20/10) ¹⁴		
DII (Harbison Walker)	Yes (8/24/10) ¹⁵		
Kaiser Aluminum	Yes (7/30/08) ¹⁶		
Keene	Yes (6/24/10) ¹⁷		
Manville	Yes (8/9/11) ¹⁸		
National Gypsum	Yes (6/24/11) ¹⁹		
NARCO			Yes (10/2/12) ²⁰
Owens Corning	Yes (1/23/09) ²¹		
Pittsburgh Corning		Yes (11/12/09) ²²	Yes (10/2/12) ²³
Plibrico	Yes (7/30/08) ²⁴		
Raybestos	Yes (8/24/10) ²⁵		
UNR	Yes (3/18/08) ²⁶		
USG	Yes (1/23/09) ²⁷		
W.R. Grace			Yes (10/2/12) ²⁸

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Beltrami AC&S Ballot at GST-EST-0555724 (GST-1863).

² Beltrami AWI Trust Claim at David 01736 (GST-1835).

³ Beltrami 2009 ASARCO Ballot at GST-EST-0555868 & GST-EST-0555878 (GST-1864 & GST-1865).

⁴ Beltrami B&W Trust Claim at David 01748 (GST-1836).

⁵ Beltrami Celotex Trust Claim at David 01845 (GST-1843).

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- ⁶ Beltrami Combustion Trust Claim at David 01769-01778 (GST-1837).
⁷ Beltrami EPI Trust Claim at David 01857 (GST-1844).
⁸ Beltrami FB Trust Claim at David 01806 (GST-1840).
⁹ Beltrami 2008 Flintkote Ballot at GST-EST-0555943 & GST-EST-0555955 (GST-1866 & GST-1867).
¹⁰ Amended Flintkote 2019 of David at David 00040-00041 (GST-1830).
¹¹ Letter to Garland Cassada from The David Law Firm, dated Dec. 12, 2012 (GAF Ballot Schedule) (David 00052-David 00055) (GST-3589).
¹² Amended GIT 2019 of David at David 00043-00044 (GST-1831).
¹³ Beltrami HKP Trust Claim at David 01873 (GST-1846).
¹⁴ Beltrami IIAL Trust Claim at David 01860 (GST-1845).
¹⁵ Beltrami IIW Trust Claim at David 01892 (GST-1847).
¹⁶ Beltrami Kaiser Trust Claim at David 01912-01927 (GST-1848).
¹⁷ Beltrami Keene Trust Claim at David 01930 (GST-1849).
¹⁸ Beltrami Manville Trust Claim at David 01839-01842 (GST-1842).
¹⁹ Beltrami NGC Trust Claim at David 01779 (GST-1838).
²⁰ Amended NARCO 2019 of David at David 00046-00047 (GST-1832).
²¹ Beltrami OC Trust Claim at David 01784 (GST-1839).
²² Beltrami 2009 PCC Ballot at GST-EST-0556037 & GST-EST-0556038 (GST-1868 & 1869).
²³ Amended PCC 2019 of David at David 00049-00050 (GST-1833).
²⁴ Beltrami Kaiser Trust Claim at David 01932-01947 (GST-1848).
²⁵ Beltrami Raybestos Trust Claim at David 01950 (GST-1851).
²⁶ Beltrami UNR Trust Claim at David 01952 (GST-1852).
²⁷ Beltrami USG Trust Claim at David 01828 (GST-1841).
²⁸ Amended WRG 2019 of David at David 00037-00038 (GST-1829).

13. Tommie Williams—Waters & Kraus—Los Angeles, California

Garlock settled Mr. Williams's mesothelioma claim for \$475,000 during jury selection. Mr. Williams and his attorneys filed seventeen Trust claims, ten ballots, and nine 2019 statements based on unidentified exposures, for a total of twenty-five unidentified exposures.¹ Five of the exposures are evidenced by 2019 statements or ballots filed before Garlock settled the case, showing that Waters & Kraus knew about the exposures and failed to disclose them to Garlock while his case was being litigated.²

¹ See Plaintiffs' Responses to General Order Standard Interrogatories Propounded by Defendants at 12-15, Ex. A (Apr. 29, 2004) (GST-6004); Plaintiffs' Amended Responses to General Order Standard Interrogatories Propounded by Defendants at 1 (Dec. 4, 2004) (GST-6003); Amended Work History Sheet (Sept. 27, 2004) (GST-6001); Summary Chart of Williams Filings *infra*.

² For timing, see Summary Chart of Williams Filings *infra*.

Summary Chart of Williams Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ABB Lummus	Yes (3/14/07) ¹		
ACandS	Yes ²	Yes (3/19/08) ³	Yes (9/21/06) ⁴
Armstrong World Industries	Yes (10/2/07) ⁵		
ARTRA	Yes ⁶		
ASARCO	Yes ⁷	Yes (7/23/09) ⁸	
Babcock & Wilcox	Yes (1/12/07) ⁹		
Burns and Roe	Yes ¹⁰		
Celotex	Yes ¹¹		
Combustion Engineering	Yes ¹²		Yes (10/3/05) ¹³
DII (Halliburton)	Yes (1/24/07) ¹⁴		
DII (Harbison-Walker)	Yes (1/24/07) ¹⁵		
Eagle Picher	Yes ¹⁶		
Federal Mogul		Yes (10/29/04) ¹⁷	
Fibreboard	Yes (12/3/07) ¹⁸	Yes (8/28/06) ¹⁹	
Flintkote		Yes (2009) ²⁰	
G-I Holdings (GAF)		Yes (1/7/09) ²¹	Yes (1/21/09) ²²
GIT			Yes (12/9/04) ²³
H.K. Porter	Yes ²⁴		
J.T. Thorpe	Yes (3/21/07) ²⁵	Yes (5/9/05) ²⁶	Yes (6/05) ²⁷
Kaiser Aluminum	Yes ²⁸	Yes (11/9/05) ²⁹	Yes (12/9/04) ³⁰
Keene	Yes (10/3/08) ³¹		
Manville	Yes ³²		
NARCO			Yes (12/9/04) ³³
National Gypsum	Yes ³⁴		
Owens Corning	Yes (12/3/07) ³⁵	Yes (8/15/06) ³⁶	Yes (3/15/05) ³⁷
Pittsburgh Corning		Yes (11/10/09) ³⁸	Yes (12/9/04) ³⁹
Quigley		Yes (11/12/12) ⁴⁰	
Raybestos	Yes (5/14/10) ⁴¹		
Thorpe Insulation	Yes (10/19/10) ⁴²	Yes (10/18/08) ⁴³	Yes (10/14/08) ⁴⁴
US Minerals		Yes (10/26/05) ⁴⁵	Yes (3/15/05) ⁴⁶
USG	Yes (7/23/10) ⁴⁷		Yes (3/15/05) ⁴⁸
W.R. Grace		Yes (5/18/09) ⁴⁹	Yes (5/14/09) ⁵⁰

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

- ¹ Williams Lummus Trust Claim at Waters 03456 (GST-6044).
- ² Williams AC&S Trust Claim at Waters 03461 (GST-6045).
- ³ Williams AC&S Ballot at Waters 03292-03294 (GST-6030).
- ⁴ AC&S 2019 of Waters & Kraus at Waters 10540-10542 (GST-5515).
- ⁵ Williams AWI Trust Claim at Waters 03488 (GST-6046).
- ⁶ Williams ARTRA Trust Claim at Waters 04128 (GST-6064).
- ⁷ Williams ASARCO Trust Claim at Waters 03533 (GST-6047).
- ⁸ Williams 2009 ASARCO Ballot at Waters 03303-03307 (GST-6031).
- ⁹ Williams B&W Trust Claim at Waters 03548 (GST-6048).
- ¹⁰ Williams Burns & Roe Trust Claim at Waters 03636 (GST-6049).
- ¹¹ Williams Celotex Trust Claim at Waters 03662 (GST-6050).
- ¹² Williams Combustion Trust Claim at Waters 03676 (GST-6051).
- ¹³ Combustion 2019 of Waters & Kraus at Waters 10585-10587 (GST-5522).
- ¹⁴ Williams IIAI Trust Claim at Waters 03813 (GST-6054).
- ¹⁵ Williams IIW Trust Claim at Waters 03857 (GST-6055).
- ¹⁶ Williams EPI Trust Claim at Waters 03770 (GST-6052).
- ¹⁷ Williams FM Ballot at Waters 03314-03321 (GST-6032).
- ¹⁸ Williams FB Trust Claim at Waters 03788 (GST-6053).
- ¹⁹ Williams FB Ballot at Waters 03324-03328 (GST-6033).
- ²⁰ Williams 2009 Flintkote Ballot at Waters 03331-03337 (GST-6034).
- ²¹ Williams GAF Ballot at Waters 03361-03363 (GST-6036).
- ²² GAF 2019 of Waters & Kraus at Waters 03225-03227 (GST-6020).
- ²³ GIT 2019 of Waters & Kraus at Waters 10610-10612 (GST-5526).
- ²⁴ Williams HKP Trust Claim at Waters 03895 (GST-6056).
- ²⁵ Williams Thorpe Trust Claim at Waters 03939 (GST-6057).
- ²⁶ Williams Thorpe Ballot at Waters 03370-03373 (GST-6037).
- ²⁷ Thorpe 2019 of Waters & Kraus at Waters 03236-03241 (GST-6021).
- ²⁸ Williams Kaiser Trust Claim at Waters 04016 (GST-6058).
- ²⁹ Williams Kaiser Ballot at Waters 03375-03377 (GST-6038).
- ³⁰ Kaiser 2019 of Waters & Kraus at Waters 10732-10734 (GST-5545).
- ³¹ Williams Keene Trust Claim at Waters 04050 (GST-6059).
- ³² Williams Manville Trust Claim at Waters 04065 (GST-6060).
- ³³ NARCO 2019 of Waters & Kraus at Waters 10768-10770 (GST-5551).
- ³⁴ Williams NGC Trust Claim at Waters 04072 (GST-6061).
- ³⁵ Williams OC Trust Claim at Waters 04083 (GST-6062).
- ³⁶ Williams OC Ballot at Waters 03380-03382 (GST-6039).
- ³⁷ Amended OC 2019 of Waters & Kraus at Waters 10878-10880 (GST-5570).
- ³⁸ Williams 2009 PCC Ballot at Waters 03388-03391 (GST-6040).
- ³⁹ PCC 2019 of Waters & Kraus at Waters 10919-10921 (GST-5576).
- ⁴⁰ Williams 2012 Quigley Ballot at Waters 03394-03398 (GST-6041).
- ⁴¹ Williams Raybestos Trust Claim at Waters 04113 (GST-6063).
- ⁴² Williams Thorpe Ins. Trust Claim at Waters 04178 (GST-6065).
- ⁴³ Williams Thorpe Ins. Ballot at Waters 01373-01377 (GST-4373).
- ⁴⁴ Thorpe Ins. 2019 of Waters & Kraus at Waters 03266-03268 (GST-6026).
- ⁴⁵ Williams USM Ballot at Waters 03419-03423 (GST-6042).
- ⁴⁶ Amended USM 2019 of Waters & Kraus at Waters 11096-11098 (GST-4431).
- ⁴⁷ Williams USG Trust Claim at Waters 04266 (GST-6066).
- ⁴⁸ Amended USG 2019 of Waters & Kraus at Waters 11065-11067 (GST-5595).
- ⁴⁹ Williams WRG Ballot at Waters 03427-03432 (GST-6043).
- ⁵⁰ ^{2nd} Amended WRG 2019 of Waters & Kraus at Waters 03286-03288 (GST-6029).

14. Michael Steckler—Waters & Kraus—San Francisco, California

Garlock settled Mr. Steckler's mesothelioma claim for \$850,000 in 2006. Mr. Steckler and his attorneys filed seventeen Trust claims, seven ballots, and eight 2019 statements based on unidentified exposures, for a total of twenty-three exposures not identified to Garlock.¹ Five of the exposures are evidenced by 2019 statements filed before Garlock settled the case (the US Minerals statement before Steckler submitted his answers to standard interrogatories), showing that Waters & Kraus knew about the exposures and failed to disclose them to Garlock while his case was being litigated.²

¹ See Plaintiff's Answers to Defendants' Standard Interrogatories—Set II at 1-3, Ex. A (Apr. 22, 2005) (GST-4335); Summary Chart of Steckler Filings *infra*.

² For timing, see Summary Chart of Steckler Filings *infra*.

Summary Chart of Steckler Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ABB Lummus	Yes ¹		
ACandS	Yes ²		
Armstrong World Industries	Yes (10/9/07) ³		
ARTRA	Yes ⁴		
Babcock & Wilcox	Yes (1/10/07) ⁵		
Celotex	Yes ⁶		
Combustion Engineering	Yes ⁷		
DII (Halliburton)	Yes (1/24/07) ⁸		
DII (Harbison Walker)	Yes (11/10/08) ⁹		
E.J. Bartells	Yes ¹⁰		
Eagle Picher	Yes ¹¹		
Federal Mogul (Flexitallic)	Yes (3/17/11) ¹²		
Fibreboard	Yes (12/3/07) ¹³	Yes (8/28/06) ¹⁴	
Flintkote		Yes (2009) ¹⁵	
G-I Holdings (GAF)		Yes (1/7/09) ¹⁶	Yes (1/21/09) ¹⁷
GIT			Yes (6/8/05) ¹⁸
J.T. Thorpe	Yes (10/11/07) ¹⁹		
Kaiser Aluminum	Yes ²⁰		Yes (6/8/05) ²¹
Keene	Yes (3/17/09) ²²		
Owens Corning	Yes (12/3/07) ²³	Yes (8/15/06) ²⁴	Yes (6/8/05) ²⁵
Pittsburgh Corning		Yes (11/10/09) ²⁶	Yes (6/8/05) ²⁷
Raybestos	Yes (5/19/10) ²⁸		
Thorpe Insulation	Yes (10/19/10) ²⁹	Yes (10/18/08) ³⁰	Yes (10/14/08) ³¹
US Minerals			Yes (3/15/05) ³²
USG	Yes (3/23/10) ³³		
W.R. Grace		Yes (5/18/09) ³⁴	Yes (5/14/09) ³⁵

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

- ¹ Steckler Lummus Trust Claim at Waters 00714 (GST-4353).
- ² Steckler AC&S Trust Claim at Waters 00734 (GST-4354).
- ³ Steckler AWI Trust Claim at Waters 00753 (GST-4355).
- ⁴ Steckler ARTRA Trust Claim at Waters 01207 (GST-4370).
- ⁵ Steckler B&W Trust Claim at Waters 00802 (GST-4356).
- ⁶ Steckler Celotex Trust Claim at Waters 00834 (GST-4357).
- ⁷ Steckler Combustion Trust Claim at Waters 00860 (GST-4358).
- ⁸ Steckler IIAL Trust Claim at Waters 00985 (GST-4363).
- ⁹ Steckler HW Trust Claim at Waters 01015 (GST-4364).
- ¹⁰ Steckler Bartells Trust Claim at Waters 00898 (GST-4360).
- ¹¹ Steckler EPI Trust Claim at Waters 00880 (GST-4359).
- ¹² Steckler FM Trust Claim at Waters 00945 (GST-4362).
- ¹³ Steckler FB Trust Claim at Waters 00910 (GST-4361).
- ¹⁴ Steckler FB Ballot at Waters 00628-00633 (GST-4346).
- ¹⁵ Steckler 2009 Flintkote Ballot at Waters 00635-00641 (GST-4347).
- ¹⁶ Steckler GAF Ballot at Waters 00665-00667 (GST-4349).
- ¹⁷ GAF 2019 of Waters & Kraus at Waters 00573-00575 (GST-4338).
- ¹⁸ 2nd Amended GIT 2019 of Waters & Kraus at Waters 10621-10623 (GST-4388).
- ¹⁹ Steckler Thorpe Trust Claim at Waters 01068 (GST-4365).
- ²⁰ Steckler Kaiser Trust Claim at Waters 01111 (GST-4366).
- ²¹ 2nd Amended Kaiser 2019 of Waters & Kraus at Waters 10743-10745 (GST-4405).
- ²² Steckler Keene Trust Claim at Waters 01161 (GST-4367).
- ²³ Steckler OC Trust Claim at Waters 01167 (GST-4368).
- ²⁴ Steckler OC Ballot at Waters 00674-00676 (GST-4350).
- ²⁵ 2nd Amended OC 2019 of Waters & Kraus at Waters 10884-10886 (GST-4409).
- ²⁶ Steckler 2009 PCC Ballot at Waters 00682-00685 (GST-5475).
- ²⁷ 2nd Amended PCC 2019 of Waters & Kraus at Waters 10931-10933 (GST-4563).
- ²⁸ Steckler Raybestos Trust Claim at Waters 01202 (GST-4369).
- ²⁹ Steckler Thorpe Ins. Trust Claim at Waters 01246 (GST-4371).
- ³⁰ Steckler Thorpe Ins. Ballot at Waters 01373-01377 (GST-4373).
- ³¹ Thorpe Ins. 2019 of Waters & Kraus at Waters 00608-00610 (GST-4343).
- ³² Amended USM 2019 of Waters & Kraus at Waters 11096-11098 (GST-4431).
- ³³ Steckler USG Trust Claim at Waters 01308 (GST-4372).
- ³⁴ Steckler WRG Ballot at Waters 00700-00705 (GST-4352).
- ³⁵ 2nd Amended WRG 2019 of Waters & Kraus at Waters 00622-00624 (GST-4345).

15. Reginald Taylor—Waters & Kraus—San Francisco, California

Garlock settled Mr. Taylor's mesothelioma claim for \$500,000 in 2006. Mr. Taylor and his attorneys filed seventeen Trust claims, one ballot, and five 2019 statements based on unidentified exposures, for a total of nineteen unidentified exposures.¹ Four of those exposures are evidenced by 2019 statements filed before Garlock settled the case (the US Minerals statement before Mr. Taylor submitted his answers to standard interrogatories), showing that Waters & Kraus knew about the exposures and failed to disclose them to Garlock while his case was being litigated.²

¹ See Plaintiffs' Amended Answers to Defendants' Standard Interrogatories (Personal Injury)—Set 2 at 1-4, Ex. A (Apr. 6, 2005) (GST-4440); Summary Chart of Taylor Filings *infra*.

² For timing, see Summary Chart of Taylor Filings *infra*.

Summary Chart of Taylor Filings			
Bankrupt	Trust Claim?	Ballot?	2019 Statement?
ACandS	Yes ¹		
Armstrong World Industries	Yes (2/14/11) ²		
ASARCO	Yes ³		
Babcock & Wilcox	Yes (1/10/07) ⁴		
Celotex	Yes ⁵		
Combustion Engineering	Yes ⁶		
DII (Halliburton)	Yes (1/10/08) ⁷		
DII (Harbison Walker)	Yes (1/10/08) ⁸		
Eagle Picher	Yes ⁹		
Federal Mogul (Flexitallic)	Yes (1/18/11) ¹⁰		
Fibreboard	Yes (2/14/08) ¹¹		
GIT			Yes (6/8/05) ¹²
H.K. Porter	Yes (8/20/07) ¹³		
Kaiser Aluminum	Yes ¹⁴		Yes (6/8/05) ¹⁵
Keene	Yes ¹⁶		
Leslie Controls	Yes ¹⁷	Yes (9/20/10) ¹⁸	
Manville	Yes ¹⁹		
Owens Corning	Yes (2/14/08) ²⁰		Yes (6/8/05) ²¹
Pittsburgh Corning			Yes (6/8/05) ²²
Plant Insulation	Yes (11/30/05) ²³		
Raybestos	Yes (12/29/10) ²⁴		
Thorpe Insulation	Yes (10/19/10) ²⁵	Yes (10/18/08) ²⁶	Yes (10/14/08) ²⁷
US Minerals	Yes ²⁸		Yes (3/15/05) ²⁹
USG	Yes (7/23/10) ³⁰		
Western	Yes ³¹		

Note: Filing date of document, when known, is in parentheses.

- = Exposure not disclosed during discovery
- = Exposure disclosed during discovery
- = Exposure not disclosed during discovery, and claim, ballot, or 2019 statement filed before Garlock resolved case (or claim contains affidavit of exposure dated before Garlock resolved case)

¹ Taylor AC&S Trust Claim at Waters 01384 (GST-4463).

² Taylor AWI Trust Claim at Waters 01438 (GST-4465).

³ Taylor ASARCO Trust Claim at Waters 01410 (GST-4464).

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- ⁴ Taylor B&W Trust Claim at Waters 01458 (GST-4466).
 - ⁵ Taylor Celotex Trust Claim at Waters 01475 (GST-4467).
 - ⁶ Taylor Combustion Trust Claim at Waters 01510 (GST-4468).
 - ⁷ Taylor HAL Trust Claim at Waters 01631 (GST-4472).
 - ⁸ Taylor IIW Trust Claim at Waters 01668 (GST-4473).
 - ⁹ Taylor EPI Trust Claim at Waters 01532 (GST-4469).
 - ¹⁰ Taylor FM Trust Claim at Waters 01591 (GST-4471).
 - ¹¹ Taylor FB Trust Claim at Waters 01567 (GST-4470).
 - ¹² 2nd Amended GIT 2019 of Waters & Kraus at Waters 10621-10623 (GST-4388).
 - ¹³ Taylor HKP Trust Claim at Waters 01731 (GST-4474).
 - ¹⁴ Taylor Kaiser Trust Claim at Waters 01756 (GST-4475).
 - ¹⁵ 2nd Amended Kaiser 2019 of Waters & Kraus at Waters 10743-10745 (GST-4405).
 - ¹⁶ Taylor Keene Trust Claim at Waters 01802 (GST-4476).
 - ¹⁷ Taylor Leslie Trust Claim at Waters 01828 (GST-4477).
 - ¹⁸ Taylor Leslie Ballot at Waters 01365-01371 (GST-4461).
 - ¹⁹ Taylor Manville Trust Claim at Waters 01839 (GST-4478).
 - ²⁰ Taylor OC Trust Claim at Waters 01842 (GST-4479).
 - ²¹ 2nd Amended OC 2019 of Waters & Kraus at Waters 10884-10886 (GST-4409).
 - ²² 2nd Amended PCC 2019 of Waters & Kraus at Waters 10931-10934 (GST-4563).
 - ²³ Taylor Plant Ins. Trust Claim at Waters 01866 (GST-4480).
 - ²⁴ Taylor Raybestos Trust Claim at Waters 01914 (GST-4481).
 - ²⁵ Taylor Thorpe Ins. Trust Claim at Waters 01945 (GST-4482).
 - ²⁶ Taylor Thorpe Ins. Ballot at Waters 01373-01377 (GST-4373).
 - ²⁷ Thorpe Ins. 2019 of Waters & Kraus at Waters 01351-01353 (GST-4459).
 - ²⁸ Taylor USM Trust Claim at Waters 02076 (GST-4483).
 - ²⁹ Amended USM 2019 of Waters & Kraus at Waters 11096-11098 (GST-4431).
 - ³⁰ Taylor USG Trust Claim at Waters 02083 (GST-4484).
 - ³¹ Taylor Western Trust Claim at Waters 02102 (GST-4485).

B. Summaries of Cases Where Garlock Used Trust Claims to Obtain a Defense Verdict**1. Victor Davis—Mundy Singley—Texas**

Mr. Davis and his counsel, in response to discovery sought by Garlock, failed to acknowledge or admit exposures to products for which Trusts were responsible.¹ Mr. Davis also refused to produce Trust claim forms evidencing such exposures. The Court compelled Mr. Davis to produce the claim forms, which revealed claims against the Manville, Celotex, H.K. Porter, UNR, and Eagle Picher Trusts.² The Trust claim forms were admitted into evidence and Garlock obtained a full defense verdict in the case.³

2. Eugene Dougherty and Michael Messinger—Angelos Firm—Philadelphia, Pennsylvania

These cases were tried together. In pretrial discovery, both Mr. Dougherty and Mr. Messinger provided non-responsive answers and objections to interrogatories seeking all their exposures to asbestos, including exposures for which Trusts were responsible.⁴ At Mr. Dougherty's deposition, defendants sought information from him about filings against Trusts, and his counsel objected and instructed him not to answer.⁵ Garlock moved to compel production of Trust claim forms filed by both Mr. Dougherty and Mr. Messinger and the Court granted the motion, requiring production days before trial. Both Mr. Dougherty and Mr. Messinger had filed Trust claims on the basis of exposures they had not disclosed: Mr. Dougherty with the Armstrong, USG, Babcock & Wilcox, Combustion Engineering, Halliburton, Harbison Walker, Celotex, Eagle Picher, Owens Corning, Fibreboard, Keene, UNR,

¹ Plaintiffs' Responses to Master Discovery Requests at 11-15 (Jun. 14, 2002) (GST-2026).

² Plaintiffs' Production of Trust Claim Forms (Jan. 5, 2004) (GST-2041, GST-2042 & GST-2043).

³ See Final Judgment, *Davis v. Garlock Sealing Technologies LLC*, No. 2002-28497 (Tex. Dist. Ct. May 17, 2004) (GST-2035).

⁴ Plaintiff's Answers to Defendants' Joint Interrogatories at 7-10 (Feb. 11, 2008) (Dougherty) (GST-2068);

Plaintiff's Answers to Defendants' Joint Interrogatories at 7-10 (Feb. 11, 2008) (Messinger) (GST-3693).

⁵ 5/14/07 Dougherty Depo. Tr. at 92:9-19 (GST-2072).

and National Gypsum Trusts,⁶ and Mr. Messinger with the H.K. Porter, Harbison Walker, Halliburton and UNR Trusts.⁷ The Trust claims for both men were admitted into evidence and Garlock obtained a full defense verdict in both cases.⁸

⁶ Dougherty's Production of Trust Claims (Aug. 7, 2008) (GST-2077).

⁷ Messinger's Production of Trust Claims (Aug. 7, 2008) (GST-3698).

⁸ See Verdict, *Dougherty v. Allied Signal, Inc.*, No. C-48-AB-2007-027 (Pa. Ct. C.P.) (GST-2080).

Appendix: Short Form Citations for Trust Claims, Ballots and 2019 Statements

Document Name	Shortened Name
Asbestos Trust Claims	
ABB Lummus 524(g) Asbestos PI Trust Claim Form	Lummus Trust Claim
AC&S Asbestos Settlement Trust Claim Form	AC&S Trust Claim
Amatex Asbestos-Related Personal Injury Proof of Claim Form	Amatex Trust Claim
AMF Incorporated Proof of Claim Form	AMF Trust Claim
Armstrong World Industries, Inc. Asbestos Personal Injury Settlement Trust Proof of Claim Form	AWI Trust Claim
ARTRA Asbestos Trust Claim Form	ARTRA Trust Claim
ASARCO Asbestos Personal Injury Settlement Trust Claim Form	ASARCO Trust Claim
Babcock & Wilcox Company Asbestos Personal Injury Settlement Trust Proof of Claim Form	B&W Trust Claim
Burns and Roe Personal Injury Settlement Trust Claim Form	Burns & Roe Trust Claim
C.E. Thurston & Son's, Inc. Asbestos Trust Claim Form	Thurston Trust Claim
Celotex Asbestos Settlement Trust Claim Form	Celotex Trust Claim
Combustion Engineering Trust Claim Form	Combustion Trust Claim
Congoleum Plan Trust Claim Form	Congoleum Trust Claim
DII Industries, LLC Asbestos PI Trust Proof of Claim Form	HAL Trust Claim or HW Trust Claim (as applicable)
Eagle-Picher Industries, Inc. Asbestos Trust Claim Form	EPI Trust Claim
E.J. Bartells Asbestos Settlement Trust Proof of Claim Form	Bartells Trust Claim
Federal Mogul Asbestos Personal Injury Trust Proof of Claim Form	FM Trust Claim (or FM (Ferodo), FM (Flex), or FM (T&N), as applicable)
G-I Holdings Inc. Asbestos Personal Injury Settlement Trust Claim Form	GAF Trust Claim
H.K. Porter Asbestos Trust Claim Form	HKP Trust Claim
J.T. Thorpe Settlement Trust Claim Form	Thorpe Trust Claim
KACC Asbestos PI Trust Claim Form	Kaiser Trust Claim
Keene Creditors Trust Claim Form	Keene Trust Claim
Leslie Controls Inc. Asbestos Trust Claim Form	Leslie Trust Claim
Manville Personal Injury Settlement Trust Claim Form	Manville Trust Claim
NGC Bodily Injury Trust Claim Form	NGC Trust Claim
Owens Corning/Fibreboard Asbestos Personal Injury Settlement Trust Proof of Claim Form	OC Trust Claim or FB Trust Claim (as applicable)
Pacor Settlement Trust Claim Form	Pacor Trust Claim
Plant Insulation Company Asbestos Claim Form	Plant Ins. Trust Claim
Plibrico Asbestos Trust Claim Form	Plibrico Trust Claim
Porter Hayden Company Asbestos Trust Claim Form	PH Trust Claim
Raybestos Asbestos Trust Claim Form	Raybestos Trust Claim
Shook & Fletcher Asbestos Settlement Trust Claim Form	Shook & Fletcher Trust Claim

T H Agriculture & Nutrition, L.L.C. Asbestos Personal Injury Trust Claim Form	THAN Trust Claim
Thorpe Insulation Settlement Trust Claim Form	Thorpe Ins. Trust Claim
UNR Asbestos-Disease Claims Trust Proof of Claim Form	UNR Trust Claim
USG Asbestos Personal Injury Settlement Trust Proof of Claim Form	USG Trust Claim
U.S. Mineral Asbestos Trust Claim Form	USM Trust Claim
Western Asbestos Settlement Trust Claim Form	Western Trust Claim
Bankruptcy Ballots	
Master Ballot & Schedule for Accepting or Rejecting the Second Plan of Reorganization of ACandS, Inc.'s under Chapter 11 of the Bankruptcy Code for Individual Holders of Class 3e Asbestos Unsecured Personal Injury Claims (2008)	AC&S Ballot
[ASARCO] Master Ballot for Attorneys Voting Asbestos Personal Injury Claims (2008)	2008 ASARCO Ballot
[ASARCO] Master Ballot for Attorneys Voting Asbestos Personal Injury Claims (2009)	2009 ASARCO Ballot
[Fairchild] Master Ballot for Class 5—General Unsecured Claims (2009)	Fairchild Ballot
[Federal Mogul] Master Joint Ballot and Proxy Form for (1) Accepting or Rejecting Third Amended Joint Plan of Reorganization, (2) Making the Demand, (3) Giving the Confirmation and (4) Providing a Proxy to Vote in Relation to the Resolutions for Holders of Individual Asbestos Personal Injury Claims (2004)	FM Ballot
Master Ballot for Accepting or Rejecting Amended Joint Plan of Reorganization (as Modified) for Individual Holders of Class 7 Asbestos Personal Injury Claims Against the Flintkote Company (2009)	2009 Flintkote Ballot
Master Ballot for Accepting or Rejecting Amended Joint Plan of Reorganization for Individual Holders of Class 7 & Class 8 Asbestos Personal Injury Claims Against the Flintkote Company and Flintkote Mines Limited (2008)	2008 Flintkote Ballot
Master Ballot for Accepting or Rejecting Second Amended Joint Plan of Reorganization of G-I Holdings Inc. and ACI Inc. Pursuant to Chapter 11 of the Bankruptcy Code (2009)	GAF Ballot
Master Ballot for Accepting or Rejecting First Amended Chapter 11 Plan of Reorganization for Hercules Chemical Company, Inc. for Class 4 Asbestos Claims and Demands (2009)	Hercules Ballot
Master Ballot for Accepting or Rejecting the Second Amended Joint Plan of Reorganization of Kaiser Aluminum Corporation, Kaiser Aluminum & Chemical Corporation and Certain of Their Debtor Affiliates (2005)	Kaiser Ballot
Master Ballot for Voting to Accept or Reject First Amended Plan of Reorganization of Leslie Controls, Inc., for Holders of Class 4 Asbestos PI Claims (2010)	Leslie Ballot

Master Ballot for Accepting or Rejecting Third Amended Plan of Reorganization for NARCO Class 4-A (NARCO Asbestos Trust Claims) (2006)	NARCO Ballot
Master Ballot for Accepting or Rejecting Sixth Amended Joint Plan of Reorganization for Owens Corning and Its Affiliated Debtors and Debtors-in-Possession (as Modified) for Holders of Class A7 OC Asbestos Personal Injury Claims That Are PI Trust Claims (2006)	OC Ballot or FB Ballot (as applicable)
[Pittsburgh Corning] Master Ballot for Accepting or Rejecting Second Amended Plan of Reorganization for Class 5A, 5B and 5C Asbestos Personal Injury Claims (2004)	2004 PCC Ballot
[Pittsburgh Corning] Master Ballot for Accepting or Rejecting Modified Third Amended Plan of Reorganization for Class 5 Channeled Asbestos PI Trust Claims (2009)	2009 PCC Ballot
Master Ballot for Accepting or Rejecting Quigley Company, Inc.'s Fourth Amended and Restated Plan of Reorganization for Holders of Class 4 Asbestos PI Claims (2006)	2006 Quigley Ballot
Master Ballot for Accepting or Rejecting Quigley Company, Inc.'s Fifth Amended and Restated Plan of Reorganization for Holders of Class 4A Pre-September 2010 Settled Claims (2012)	2012 Quigley Ballot
Ballot Regarding J.T. Thorpe, Inc., a California corporation, J.T. Thorpe, Inc., a dissolved California corporation, Thorpe Technologies, Inc., a California corporation and Thorpe Holding Company, a California corporation concerning only Asbestos Related Personal Injury (Class 4) Claims (2005)	Thorpe Ballot
[Thorpe Insulation] Master Ballot for Accepting or Rejecting First Amended Joint Plan of Reorganization for Individual Holders of Class 5 Asbestos Injury Claims (2008)	Thorpe Ins. Ballot
Special Ballot for Accepting or Rejecting the Fifth Amended Plan Jointly Proposed by the Chapter 11 Trustee and the Official Committee of Asbestos Bodily Injury and Property Damage Claimants for United States Mineral Products Company (2005)	USM Ballot
[W.R. Grace] Voting Instructions and Master Ballot for Holders of Class 6 Asbestos PI Claims (2009)	WRG Ballot
2019 Statements	
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (AC&S) (Sept. 21, 2006)	AC&S 2019 of Waters & Kraus
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Combustion) (Oct. 3, 2005)	Combustion 2019 of Waters & Kraus
Second Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Combustion) (Mar. 6, 2006)	2nd Amended Combustion 2019 of Waters & Kraus
Amended and Restated Verified Statement in Connection with the Representation of Creditors as Required by F.R.B.P. Rule 2019 (Flintkote) (Oct. 2, 2012)	Amended Flintkote 2019 of David

Verified Statement in Connection with Representation of Creditors Pursuant to Bankruptcy Rule 2019 (GAF) (Jan. 21, 2009)	GAF 2019 of Waters & Kraus
Amended and Restated Verified Statement in Connection with the Representation of Creditors as Required by F.R.B.P. Rule 2019 (GIT) (Oct. 2, 2012)	Amended GIT 2019 of David
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (GIT) (Dec. 9, 2004)	GIT 2019 of Waters & Kraus
Second Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (GIT) (June 8, 2005)	2nd Amended GIT 2019 of Waters & Kraus
Fifth Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (GIT) (Mar. 6, 2006)	5th Amended GIT 2019 of Waters & Kraus
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Kaiser) (Dec. 9, 2004) Second Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Kaiser) (June 8, 2005)	Kaiser 2019 of Waters & Kraus 2nd Amended Kaiser 2019 of Waters & Kraus
Amended and Restated Verified Statement in Connection with the Representation of Creditors as Required by F.R.B.P. Rule 2019 (NARCO) (Oct. 2, 2012)	Amended NARCO 2019 of David
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (NARCO) (Dec. 9, 2004)	NARCO 2019 of Waters & Kraus
Fifth Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (NARCO) (Mar. 6, 2006)	5th Amended NARCO 2019 of Waters & Kraus
Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (OC) (Mar. 15, 2005)	Amended OC 2019 of Waters & Kraus
Second Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (OC) (June 8, 2005)	2nd Amended OC 2019 of Waters & Kraus
Fifth Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (OC) (Mar. 6, 2006)	5th Amended OC 2019 of Waters & Kraus
Amended and Restated Verified Statement in Connection with the Representation of Creditors as Required by F.R.B.P. Rule 2019 (PCC) (Oct. 2, 2012)	Amended PCC 2019 of David
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (PCC) (Dec. 9, 2004)	PCC 2019 of Waters & Kraus
Second Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (PCC) (June 8, 2005)	2nd Amended PCC 2019 of Waters & Kraus

Fifth Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (PCC) (Mar. 6, 2006)	5th Amended PCC 2019 of Waters & Kraus
Federal Rule of Bankruptcy Procedure 2019 Statement by Waters & Kraus L.L.P. (Thorpe) (Jun. 2005)	Thorpe 2019 of Waters & Kraus
Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Thorpe Ins.) (Oct. 14, 2008)	Thorpe Ins. 2019 of Waters & Kraus
Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (USG) (Mar. 15, 2005)	Amended USG 2019 of Waters & Kraus
Fifth Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (USG) (Mar. 6, 2006)	5th Amended USG 2019 of Waters & Kraus
Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (USM) (Mar. 15, 2005)	Amended USM 2019 of Waters & Kraus
Amended and Restated Verified Statement in Connection with the Representation of Creditors as Required by F.R.B.P. Rule 2019 (WRG) (Oct. 2, 2012)	Amended WRG 2019 of David
Second Amended Verified Statement of Waters & Kraus, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2019 (WRG) (May 14, 2009)	2nd Amended WRG 2019 of Waters & Kraus

Exhibit A

**DEBTORS' LIST OF EXHIBITS PERTAINING
TO CERTAIN RFA LIST 1.A CASES**

Trial Exhibit #	Description
GST-0402	Decision and Order, In re New York City Asbestos Litigation, dated 11/15/12
GST-1171	Plaintiff's Responses to General Order Standard Interrogatories Propounded by Defendants
GST-1600	Combined Spreadsheet of DCPF Data Productions
GST-1601	Letter from Mr. Stephen Juris, dated September 5, 2012, enclosing data from the Delaware Claims Processing Facility
GST-1602	DCPF Data (Produced 9-05-2012) - Armstrong World Industries
GST-1603	DCPF Data (Produced 9-05-2012) - Babcock & Wilcox
GST-1604	DCPF Data (Produced 9-05-2012) - DII Industries
GST-1605	DCPF Data (Produced 9-05-2012) - Federal Mogul
GST-1606	DCPF Data (Produced 9-05-2012) - Owens Corning FibreBoard
GST-1607	DCPF Data (Produced 9-05-2012) - US Gypsum
GST-1608	Letter from Mr. Stephen Juris, dated November 15, 2012, enclosing data from the Delaware Claims Processing Facility
GST-1609	DCPF Data (Produced 11-15-2012) - Armstrong World Industries
GST-1610	DCPF Data (Produced 11-15-2012) - Babcock & Wilcox
GST-1611	DCPF Data (Produced 11-15-2012) - DII Industries
GST-1612	DCPF Data (Produced 11-15-2012) - Federal Mogul
GST-1613	DCPF Data (Produced 11-15-2012) - Owens Corning FibreBoard
GST-1614	DCPF Data (Produced 11-15-2012) - US Gypsum
GST-7056	Binder of Phillips Trust Claims
GST-7121	Ballots Filed by Claimants in Bankruptcy Cases
GST-1829	In re W.R. Grace, Amended and Restated 2019 Statement filed by The David Law Firm referencing Raymond Beltrami and Peter Homa (dated Oct. 2, 2012)
GST-1830	In re Flintkote Company, Amended and Restated 2019 Statement filed by The David Law Firm referencing Raymond Beltrami and Peter Homa (dated Oct. 2, 2012)
GST-1831	In re GIT, Amended and Restated 2019 Statement filed by The David Law Firm referencing Raymond Beltrami and Peter Homa (dated Oct. 2, 2012)
GST-1832	In re NARC, Amended and Restated 2019 Statement filed by The David Law Firm referencing Raymond Beltrami and Peter Homa (dated Oct. 2, 2012)
GST-1833	In re PCC, Amended and Restated 2019 Statement filed by The David Law Firm referencing Raymond Beltrami and Peter Homa (dated Oct. 2, 2012)
GST-1835	Trust Claim for Raymond Beltrami submitted to AWI
GST-1836	Trust Claim for Raymond Beltrami submitted to BW
GST-1837	Trust Claim for Raymond Beltrami submitted to Combustion
GST-1838	Trust Claim for Raymond Beltrami submitted to NGC
GST-1839	Trust Claim for Raymond Beltrami submitted to OC
GST-1840	Trust Claim for Raymond Beltrami submitted to FB
GST-1841	Trust Claim for Raymond Beltrami submitted to USG
GST-1842	Trust Claim for Raymond Beltrami submitted to Manville
GST-1843	Trust Claim for Raymond Beltrami submitted to Celotex
GST-1844	Trust Claim for Raymond Beltrami submitted to Fagle Picher
GST-1845	Trust Claim for Raymond Beltrami submitted to DII (IAL)
GST-1846	Trust Claim for Raymond Beltrami submitted to HK Porter
GST-1847	Trust Claim for Raymond Beltrami submitted to DII (HW)
GST-1848	Trust Claim for Raymond Beltrami submitted to Kaiser
GST-1849	Trust Claim for Raymond Beltrami submitted to Keene
GST-1850	Trust Claim for Raymond Beltrami submitted to Plibrico
GST-1851	Trust Claim for Raymond Beltrami submitted to Raymark

Trial Exhibit #	Description
GST-1852	Trust Claim for Raymond Beltrami submitted to UNR
GST-1853	Deposition of Raymond Beltrami (Vol. 1), taken 4/15/08
GST-1854	Deposition of Raymond Beltrami (Vol. 2), taken 4/16/08
GST-1855	Deposition of Raymond Beltrami (Vol. 3), taken 4/17/08
GST-1856	Deposition of Raymond Beltrami (Vol. 4), taken 5/7/08
GST-1857	Deposition of Raymond Beltrami, taken 5/8/08
GST-1862	Plaintiff's Interrogatory Responses, dated 4/3/08
GST-1863	AC&S Beltrami Ballot and Claimant Schedule
GST-1864	ASARCO 2009 Beltrami Ballot
GST-1865	ASARCO 2009 Beltrami Claimant Schedule
GST-1866	Flintkote 2008 Beltrami Ballot
GST-1867	Flintkote 2008 Beltrami Claimant Schedule Excerpt
GST-1868	PCC 2009 Beltrami Ballot
GST-1869	PCC 2009 Beltrami Claimant Schedule
GST-1938	Brennan Answers to Interrogatories, dated 9/11/08
GST-1942	Deposition of Bobby Hall, taken 12/3/09
GST-1973	WR Grace Brennan Ballot
GST-1974	WR Grace Brennan Claimant Schedule
GST-1975	ASARCO Master Ballot for Brennan and Golini
GST-1976	Trust Claim for John Brennan submitted to AWI
GST-1977	Trust Claim for John Brennan submitted to BW
GST-1978	Trust Claim for John Brennan submitted to Celotex
GST-1979	Trust Claim for John Brennan submitted to Combustion
GST-1980	Trust Claim for John Brennan submitted to Eagle Picher
GST-1981	GAF Master Ballot, dated 11/19/09, for Brennan
GST-1982	Trust Claim for John Brennan submitted to Manville
GST-1983	Trust Claim for John Brennan submitted to NGC
GST-1984	Trust Claim for John Brennan submitted to OC
GST-1985	Trust Claim for John Brennan submitted to FB
GST-1986	Trust Claim for John Brennan submitted to Pacor
GST-1987	Ballot for John Brennan and Golini submitted in PCC case
GST-1988	Plaintiff's Answers to General Interrogatories, dated August 20, 2009
GST-1989	Ballot for John Brennan and Golini submitted in Quigley case
GST-1990	Trust Claim for John Brennan submitted to Raymark
GST-1991	Trust Claim for John Brennan submitted to DII
GST-1992	Trust Claim for John Brennan submitted to DII (HW)
GST-1993	Trust Claim for John Brennan submitted to USG
GST-1994	Ballot submitted for Brennan, Golini, and Grabowski in Hercules case
GST-2025	Deposition of Victor Davis, taken 6/20/02
GST-2026	Plaintiffs' Responses to Master Discovery Requests. Victor Davis.6.14.02
GST-2027	Plaintiffs' Responses to Discovery. Victor Davis (Soc. Security Records)
GST-2028	Davis Trial Transcript, 1/27/04 (Excerpt of Dr. Arnold Brody Testimony)
GST-2029	Davis Trial Transcript, 2/3/04 (Excerpt of Allan Feingold, M.D. Testimony)
GST-2030	Davis Trial Transcript, 1/26/04 (Excerpt of William Ewing Testimony)
GST-2031	Supplemental Response to Master Discovery Requests. Victor Davis.12.19.03
GST-2034	Final Judgment Nunc Pro Tunc (Not signed by Judge)
GST-2035	Final Judgment
GST-2037	Pltf's Supplemental Response to Discovery, dated 10/8/02
GST-2038	Pltf's First Amend Resp to Master Discovery, dated 11/4/02
GST-2041	Trust claim forms.redacted
GST-2042	HK Porter claim forms
GST-2043	JM claim form from trust

Trial Exhibit #	Description
GST-2068	Answers to Rogs (2-11-08)
GST-2069	Answers to Rogs (Prior Phila. County case)
GST-2070	Answers to Rogs (5-11-07)
GST-2071	Deposition of Eugene Dougherty, taken 5/15/07
GST-2072	Deposition of Eugene Dougherty, taken 5/14/07
GST-2073	Deposition of Eugene Dougherty (Vol. 1), taken 8/2/06 (Prior Phila. County case)
GST-2074	Deposition of Eugene Dougherty (Vol. 2), taken 8/2/06 (Prior Phila. County case)
GST-2075	Deposition of Eugene Dougherty (Vol. 3), taken 8/2/06 (Prior Phila. County case)
GST-2076	Deposition of Eugene Dougherty (Vol. 4), taken 8/2/06 (Prior Phila. County case)
GST-2077	Dougherty Trust Claim Forms
GST-2080	Dougherty Verdict Sheet
GST-2756	Videotaped Trial Testimony of Robert Flynn (12/3/04)
GST-2757	Plaintiff Depo on 10/29/04-Vol. 1
GST-2758	Plaintiff Depo on 11/9/04-Vol. 2
GST-2759	Plaintiff Depo on 11/19/04-Vol. 3
GST-2760	Plaintiff Depo on 12/3/04-Vol. 4
GST-2761	Plaintiff's Interrogatories, dated 10/21/04
GST-2763	2019 Statement from GI Holdings case, dated 1/21/09, with Robert Flynn's name listed
GST-2769	2nd Amended 2019 Statement from WRG case, dated 5/14/09, with Robert Flynn's name listed
GST-2770	Master Ballot, dated 12/2/09, from Fairchild case with Robert Flynn's name listed
GST-2771	2009 Flintkote Master Ballot with Robert Flynn's name listed
GST-2772	GI Holdings Ballot, dated 1/7/09, for Flynn
GST-2773	Ballot for Robert Flynn submitted in Fibreboard, dated 8/29/06
GST-2774	Ballot for Robert Flynn submitted in PCC, dated 11/10/09
GST-2775	Ballot for Robert Flynn submitted in Quigley, dated 11/12/12
GST-2776	Ballot for Robert Flynn submitted in WR Grace, dated 5/18/09
GST-2777	Trust Claim for Robert Flynn submitted to ABB Lummus
GST-2778	Trust Claim for Robert Flynn submitted to AWI
GST-2779	Trust Claim for Robert Flynn submitted to B&W
GST-2780	Trust Claim for Robert Flynn submitted to Combustion
GST-2781	Trust Claim for Robert Flynn submitted to Celotex
GST-2782	Trust Claim for Robert Flynn submitted to Eagle Picher
GST-2783	Trust Claim for Robert Flynn submitted to FB
GST-2784	Trust Claim for Robert Flynn submitted to Manville
GST-2785	Trust Claim for Robert Flynn submitted to DII (HAL)
GST-2786	Trust Claim for Robert Flynn submitted to Kaiser
GST-2787	Trust Claim for Robert Flynn submitted to Keene
GST-2788	Trust Claim for Robert Flynn submitted to OC
GST-2789	Trust Claim for Robert Flynn submitted to Porter Hayden
GST-2790	Trust Claim for Robert Flynn submitted to Raymark
GST-2791	Trust Claim for Robert Flynn submitted to UNR
GST-2792	2nd Amended Combustion 2019 Statement for Flynn, Treggett and Williams, dated 3/6/06
GST-2794	5th Amended GIT 2019 Statement for Flynn, Steckler, Taylor, Treggett and Williams, dated 3/6/06
GST-2808	5th Amended NARCO 2019 Statement for Flynn, Treggett and Williams, dated 3/6/06
GST-2822	5th Amended Owens Corning 2019 Statement for Flynn, Steckler, Taylor, Treggett and Williams, dated 3/6/06
GST-2824	5th Amended PCC 2019 Statement for Flynn, Steckler, Taylor Treggett and Williams, dated 3/6/06
GST-2838	5th Amended USG 2019 Statement for Flynn, Treggett and Williams, dated 3/6/06
GST-2839	Golini Continued Oral Deposition of Plaintiff (Day Three AM) taken on 8-12-09
GST-2840	Golini Continued Oral Deposition of Plaintiff (Day Two) taken on 8-11-09
GST-2841	Golini Continued Videotape Deposition of Plaintiff (Day Three PM) taken on 8-12-09
GST-2842	Golini Oral Deposition of Plaintiff taken on 8-10-09

Trial Exhibit #	Description
GST-2844	Golini Videotape Deposition of Plaintiff taken on 8-10-09
GST-2845	Golini Signed Verification and Updated Rogs 8-7-09
GST-2847	Golini Answers to Rogs
GST-2862	WR Grace Golini Ballot
GST-2863	WR Grace Golini Claimant Schedule
GST-2864	Trust Claim for Vincent Golini submitted to ARTRA
GST-2866	Trust Claim for Vincent Golini submitted to Celotex
GST-2867	Trust Claim for Vincent Golini submitted to Combustion
GST-2868	Trust Claim for Vincent Golini submitted to DII (HAI.)
GST-2869	Durabla Master Ballot for Golini, dated 10/18/11
GST-2870	Trust Claim for Vincent Golini submitted to Eagle Picher
GST-2871	Trust Claim for Vincent Golini submitted to Federal Mogul-FLX
GST-2872	Trust Claim for Vincent Golini submitted to Federal Mogul- T&N
GST-2873	Trust Claim for Vincent Golini submitted to HK Porter
GST-2874	Trust claim for Vincent Golini submitted to Kaiser
GST-2875	Trust Claim for Vincent Golini submitted to Manville
GST-2876	Trust Claim for Vincent Golini submitted to NGC
GST-2877	Trust Claim for Vincent Golini submitted to FB
GST-2878	Trust Claim for Vincent Golini submitted to OC
GST-2879	Trust Claim for Vincent Golini submitted to Pacor
GST-2881	Trust Claim for Vincent Golini submitted to Pilbrico
GST-2883	Trust Claim for Vincent Golini submitted to Raymark
GST-2884	Trust Claim for Vincent Golini submitted to DII (IIW)
GST-2885	Trust Claim for Vincent Golini submitted to USG
GST-2887	Trust Claim for Vincent Golini submitted to AWI
GST-2888	Trust Claim for Vincent Golini submitted to BW
GST-2889	Bondex 2019 Statement for Homa, dated 4/11/11
GST-2896	Videotaped Deposition of Peter Homa, taken 4/28/09
GST-2897	Deposition of Peter Homa (Vol. 2), taken 6/18/08
GST-2898	Homa Trial Transcript, 4/21/09 and subsequent days
GST-3589	Exhibit A to Master Ballots (for ASARCO, Flintkote and GI Holdings) for Raymond Beltrami and Peter Homa
GST-3590	Quigley Master Ballot for The David Law Firm for Peter Homa (dated Nov. 15, 2012)
GST-3591	Trust Claim, dated 5/15/09, for Peter Homa submitted to AWI
GST-3592	Trust Claim, dated 5/15/09, for Peter Homa submitted to B&W
GST-3593	Undated Trust Claim for Peter Homa submitted to Combustion
GST-3594	Undated Trust Claim for Peter Homa submitted to Celotex
GST-3595	Undated Trust Claim for Peter Homa submitted to Eagle Picher
GST-3596	Trust Claim, dated 5/15/09, for Peter Homa submitted to FB
GST-3597	Trust Claim, dated 11/22/10, for Peter Homa submitted to Flexitallic
GST-3598	Undated Trust Claim for Peter Homa submitted to G-I Holdings
GST-3599	Trust Claim, dated 5/15/09, for Peter Homa submitted to DII
GST-3600	Undated Trust Claim for Peter Homa submitted to HK Porter
GST-3601	Trust Claim, dated 3/16/10, for Peter Homa submitted to DII
GST-3602	Trust Claim, dated 11/17/08, for Peter Homa submitted to Manville
GST-3603	Undated Trust Claim for Peter Homa submitted to Kaiser
GST-3604	Trust Claim, dated 5/15/09, for Peter Homa submitted to Keene
GST-3605	Undated Trust Claim for Peter Homa submitted to NGC
GST-3606	Trust Claim, dated 5/15/09, for Peter Homa submitted to OC
GST-3607	Trust Claim, dated 5/20/09, for Peter Homa submitted to Pacor
GST-3608	Undated Trust Claim for Peter Homa submitted to Pilbrico
GST-3609	Trust Claim, dated 3/16/10, for Peter Homa submitted to Raymark

Trial Exhibit #	Description
GST-3610	Undated Trust Claim for Peter Homa submitted to Shook & Fletcher
GST-3611	Undated Trust Claim for Peter Homa submitted to UNR
GST-3612	Trust Claim, dated 5/15/09, for Peter Homa submitted to USG
GST-3613	Deposition of Peter Homa, taken 10/2/08
GST-3614	Deposition of Peter Homa, taken 6/17/08
GST-3615	Homa, Peter.Trial Transcript.04-27-2009
GST-3616	Homa, Peter.Trial Transcript.04-29-2009
GST-3617	Homa, Peter.Trial Transcript.04-30-2009
GST-3618	Homa, Peter.Trial Transcript.05-01-2009
GST-3619	Homa, Peter.Trial Transcript.05-04-2009
GST-3620	Homa, Peter.Trial Transcript.05-06-2009
GST-3621	Homa, Peter.Trial Transcript.05-07-2009
GST-3622	Homa, Peter.Trial Transcript.05-08-2009
GST-3623	Homa, Peter.Trial Transcript.05-11-2009
GST-3624	Homa, Peter.Trial Transcript.05-13-2009
GST-3625	Homa, Peter.Trial Transcript.05-14-2009
GST-3629	Plaintiff's Interrogatories, dated 5/29/08
GST-3634	ASARCO 2009 Homa Ballot
GST-3635	ASARCO 2009 Homa Claimant Schedule
GST-3636	Flintkote 2008 Homa Ballot
GST-3637	Flintkote 2008 Homa Claimant Schedule Excerpt
GST-3638	PCC 2009 Homa Ballot
GST-3639	PCC 2009 Homa Claimant Schedule
GST-3641	Massinger Answers to Rogs, dated 6/30/08
GST-3643	Massinger Daniel H. Serman Trial Testimony Day II Phase I
GST-3671	Deposition of Bernard Massinger, taken 7/2/08, 11:15 AM
GST-3672	Deposition of Bernard Massinger, taken 6/5/09
GST-3673	Deposition of Bernard Massinger, taken 7/2/08, 10:10 AM
GST-3674	ASARCO 2009 Massinger Ballot
GST-3675	ASARCO 2009 Massinger Claimant Schedule
GST-3676	PCC 2009 Massinger Ballot
GST-3677	PCC 2009 Massinger Claimant Schedule
GST-3678	Quigley 2006 Massinger Ballot and Claimant Schedule
GST-3679	WR Grace Massinger Ballot
GST-3680	WR Grace Massinger Claimant Schedule
GST-3681	Trust Claim for Bernard Massinger submitted to BW
GST-3682	Trust claim for Bernard Massinger submitted to Combustion
GST-3683	Trust Claim for Bernard Massinger submitted to DII (HAL)
GST-3684	Trust Claim for Bernard Massinger submitted to Eagle Picher
GST-3685	Trust Claim for Bernard Massinger submitted to Federal Mogul
GST-3686	Trust Claim for Bernard Massinger submitted to FB
GST-3687	Trust Claim for Bernard Massinger submitted to Manville
GST-3688	Trust Claim for Bernard Massinger submitted to OC
GST-3689	Trust Claim for Bernard Massinger to Pacor
GST-3690	Trust claim for Bernard Massinger submitted to Raymark
GST-3691	Trust claim for Bernard Massinger submitted to Shook & Fletcher
GST-3692	Trust claim for Bernard Massinger submitted to USG
GST-3693	Answers to Rogs, dated 2/11/08
GST-3698	Trust Claims
GST-3699	Deposition of Michael Messinger, taken 5/20/08
GST-3700	Deposition of Michael Messinger, taken 11/9/07
GST-3701	Deposition of Michael Messinger, taken 2/14/08

Trial Exhibit #	Description
GST-3738	Ornstein.case.report
GST-3740	Redacted and Produced Summary of Ornstein Depo
GST-3741	Plaintiffs' Responses to General Order Standard Interrogatories, dated 5/22/08
GST-3819	Deposition Summaries of Howard & Roselyn Ornstein from depts taken on June 2-6 and July 23-24, 2008
GST-3831	Deposition of Howard Ornstein, taken on June 2, 2008 (Volume 1) (Trial Preservation)
GST-3832	Deposition of Howard Ornstein, taken on June 3, 2008 (Volume 1) (Discovery)
GST-3833	Deposition of Howard Ornstein, taken on June 4, 2008 (Volume 2) (Discovery)
GST-3834	Deposition of Howard Ornstein, taken on June 5, 2008 (Volume 3) (Discovery)
GST-3835	Deposition of Howard Ornstein, taken on June 6, 2008 (Volume 4) (Discovery)
GST-3852	Plaintiffs' Response to General Order Standard Interrogatories, Propounded by Defendants (friction), dated May 22, 2008
GST-3870	Declaration related to Trust Claim for Howard Ornstein submitted to Keene
GST-3872	Trust Claim for Howard Ornstein submitted to AC&S
GST-3873	Declaration related to Trust Claim for Howard Ornstein submitted to AC&S
GST-3874	Amatex Trust Claim for Ornstein
GST-3875	Trust Claim for Howard Ornstein submitted to Armstrong
GST-3876	Declaration related to Trust Claim for Howard Ornstein submitted to Armstrong
GST-3877	Trust Claim for Howard Ornstein submitted to Combustion
GST-3878	Declaration related to Trust Claim for Howard Ornstein submitted to Combustion
GST-3879	Trust Claim for Howard Ornstein submitted to DII (HAL)
GST-3880	Declaration related to Trust Claim for Howard Ornstein submitted to DII (HAL)
GST-3881	Trust Claim for Howard Ornstein submitted to Eagle Picher
GST-3882	Declaration related to Trust Claim for Howard Ornstein submitted to Eagle Picher
GST-3883	Trust Claim for Howard Ornstein submitted to FB
GST-3884	Trust Claim for Howard Ornstein submitted to H.K. Porter
GST-3885	Declaration related to Trust Claim for Howard Ornstein submitted to H.K. Porter
GST-3887	Trust Claim for Howard Ornstein submitted to Keene
GST-3888	Declaration related to Trust Claim for Howard Ornstein submitted to Keene
GST-3889	Owens Corning Trust Claim for Ornstein
GST-3890	Declaration related to Trust Claims for Howard Ornstein submitted to OC and FB
GST-3891	Trust Claim for Howard Ornstein submitted to Thorpe Insulation
GST-3898	Deposition of John Phillips, taken 10/9/08
GST-3941	Plaintiffs Eighth Supplemental Responses to Master Interrogatories
GST-3942	Plaintiffs Eleventh Supplemental Responses to Master Interrogatories
GST-3947	Plaintiffs First Supplemental Responses to Master Interrogatories
GST-3948	Plaintiffs Ninth Supplemental Responses to Master Interrogatories
GST-3949	Plaintiffs Responses to Master Interrogatories
GST-3951	Plaintiffs Second Supplemental Responses to Master Interrogatories
GST-3952	Plaintiffs Seventh Supplemental Responses to Master Interrogatories
GST-3953	Plaintiffs Sixth Supplemental Responses to Master Interrogatories
GST-3954	Plaintiffs' Tenth Supplemental Responses
GST-3955	Plaintiffs Twelfth Supplemental Responses to Master Interrogatories
GST-3956	Plaintiff's Fifth Supp Responses to Master Interrogatories
GST-3957	Plaintiff's Thirteenth Supp Responses to Master Interrogatories
GST-3958	Plaintiff's Fourth Supp Responses to Master Interrogatories
GST-3959	Plaintiff's Third Supp Responses to Master Interrogatories
GST-3967	Phillips, John.Pre-trial Hearing 02/27/09 and 2/28/09
GST-3976	ASARCO 2008 Phillips Ballot
GST-3977	ASARCO 2008 Phillips Claimant Schedule
GST-3978	ASARCO 2009 Phillips Ballot
GST-4067	Reed Case Report (Personal Injury), dated 4/16/07

Trial Exhibit #	Description
GST-4068	Reed Case Report (Wrongful Death), dated 7/26/07
GST-4069	Deposition of Robert Reed, taken 2/20/07
GST-4070	Robert Reed's Amended Responses to General Order Standard Interrogatories (Personal Injury-Set 1), dated 2/1/07
GST-4071	Robert Reed's Responses to General Order Standard Interrogatories (Personal Injury-Set 1), dated 1/3/07
GST-4072	Robert Reed II's Response to General Order Standard Interrogatories (Wrongful Death), dated 2/5/08
GST-4074	Redacted and Produced Summary of Reed Depo
GST-4084	Plaintiff Mathilde T. Reed's Response to General Order Standard Interrogatories (Wrongful Death), dated 2/5/08
GST-4085	Plaintiff Amended Responses to Interrogatories
GST-4087	Work History
GST-4091	Plaintiff Mathilde T. Reed's Responses to General Order Standard Interrogatories Propounded by Defendants, dated February 16, 2007
GST-4093	Deposition of Robert Reed (Volume 6), taken on March 10, 2007
GST-4094	Deposition of Robert Reed (Volume 7), taken on March 11, 2007
GST-4095	Deposition of Robert Reed (Volume 1), taken on March 5, 2007
GST-4096	Deposition of Robert Reed (Volume 2), taken on March 6, 2007
GST-4097	Deposition of Robert Reed (Volume 3), taken on March 7, 2007
GST-4098	Deposition of Robert Reed (Volume 4), taken on March 8, 2007
GST-4099	Deposition of Robert Reed (Volume 5), taken on March 9, 2007
GST-4178	Trust Claim for Robert Reed submitted to ASARCO
GST-4179	Trust Claim for Robert Reed submitted to ARTRA
GST-4180	Trust Claim for Robert Reed submitted to B&W
GST-4181	Trust Claim for Robert Reed submitted to Combustion
GST-4182	Trust Claim for Robert Reed submitted to Congoleum
GST-4183	Trust Claim for Robert Reed submitted to Ferodo (Fed Mogul)
GST-4184	Trust Claim for Robert Reed submitted to G-I Holdings
GST-4185	Trust Claim for Robert Reed submitted to DII (HAL)
GST-4186	Trust Claim for Robert Reed submitted to OC
GST-4187	Trust Claim for Robert Reed submitted to USG
GST-4188	Trust Claim for Robert Reed submitted to Western Asbestos
GST-4189	Trust Claim for Robert Reed submitted to Celotex
GST-4190	Trust Claim for Robert Reed submitted to Eagle Picher
GST-4191	Trust Claim for Robert Reed submitted to John Manville
GST-4192	Trust Claim for Robert Reed submitted to Raybestos
GST-4310	Steckler.Plaintiffs' Answers to Defendants' Standard Interrogatories (Loss of Consortium)
GST-4312	Deposition of Michael Steckler (Vol. 3), taken 5/17/05
GST-4313	Deposition of Michael Steckler (Vol. 1), taken 5/5/05 PM
GST-4314	Deposition of Michael Steckler (Vol. 2), taken 5/6/05
GST-4315	Deposition of Michael Steckler, taken 5/5/05 AM
GST-4317	Redacted Summary of Michael Steckler Depo
GST-4335	Steckler.Plaintiffs' Answers to Defendants' Standard Interrogatories (Personal Injury-Set 2)
GST-4338	2019 Statement, dated 1/21/09, containing Michael Steckler's name submitted in G-I Holdings
GST-4343	2019 Statement in Thorpe for Steckler, dated 10/14/08
GST-4345	2nd Amended WRG 2019 Statement for Steckler, dated 5/14/09
GST-4346	FB Ballot for Steckler and Treggett, dated 8/28/06
GST-4347	2009 Flintkote Ballot for Michael Steckler and Treggett
GST-4348	2008 Flintkote Ballot for Michael Steckler and Treggett
GST-4349	Ballot submitted by Michael Steckler to G-I Holdings, dated 1/7/09
GST-4350	Ballot submitted by Michael Steckler to OC, dated 8/15/06
GST-4352	Ballot submitted by Michael Steckler to WR Grace, dated 5/18/09

Trial Exhibit #	Description
GST-4353	Trust Claim for Michael Steckler submitted to ABB Lummus
GST-4354	Trust Claim for Michael Steckler submitted to ACandS
GST-4355	Trust Claim for Michael Steckler submitted to AWI
GST-4356	Trust Claim for Michael Steckler submitted to B&W
GST-4357	Trust Claim for Michael Steckler submitted to Celotex
GST-4358	Trust Claim for Michael Steckler submitted to Combustion Eng'g
GST-4359	Trust Claim for Michael Steckler submitted to Eagle Picher
GST-4360	Trust Claim for Michael Steckler submitted to Bartells
GST-4361	Trust Claim for Michael Steckler submitted to Fibreboard
GST-4362	Trust Claim for Michael Steckler submitted to Federal Mogul (Flexitallic)
GST-4363	Trust Claim for Michael Steckler submitted to DII (Halliburton)
GST-4364	Trust Claim for Michael Steckler submitted to DII (HW)
GST-4365	Trust Claim for Michael Steckler submitted to J.T. Thorpe
GST-4366	Trust Claim for Michael Steckler submitted to Kaiser Aluminum
GST-4367	Trust Claim for Michael Steckler submitted to Keene
GST-4368	Trust Claim for Michael Steckler submitted to OC
GST-4369	Trust Claim for Michael Steckler submitted to Raymark
GST-4370	Trust Claim for Michael Steckler submitted to ARTRA
GST-4371	Trust Claim for Michael Steckler, submitted to Thorpe Insulation
GST-4372	Trust Claim for Michael Steckler submitted to USG
GST-4373	Ballot submitted for Steckler, Taylor, and Williams in Thorpe Insulation, dated 10/18/08
GST-4381	Deposition of Michael Steckler (Vol. 4), taken 5/18/05
GST-4382	Deposition of Michael Steckler (Vol. 5), taken 5/19/05
GST-4383	Deposition of Dee Steckler, taken 5/17/05
GST-4387	Steckler.Plaintiffs' Answers to Defendants' Standard Interrogatories (Personal Injury-Set 1)
GST-4388	2nd Amended GIT 2019 Statement for Steckler, Taylor, Treggett and Williams, dated 6/8/05
GST-4405	2nd Amended Kaiser 2019 Statement for Steckler, Taylor, Treggett and Williams, dated 6/8/05
GST-4409	2nd Amended Owens Coming 2019 Statement for Steckler, Taylor, Treggett and Williams, dated 6/8/05
GST-4431	Amended US Mineral 2019 Statement for Steckler, Taylor, Treggett and Williams, dated 3/15/05
GST-4440	Taylor.Amend.Ans. Standard Rogs (Set 2)
GST-4441	Taylor.Ans. Standard Rogs (Set 1)
GST-4442	Deposition of Reginald Taylor (Vol 1), taken 5/9/05
GST-4443	Deposition of Reginald Taylor (Vol 2), taken 5/10/05
GST-4444	Deposition of Reginald Taylor (Vol 3), taken 5/11/05
GST-4445	Deposition of Reginald Taylor (Vol 4), taken 5/12/05
GST-4452	Taylor.Pl's Resp to Stand Rogs-Set 1 (Loss of Consortium)
GST-4459	Thorpe 2019 Statement for Taylor, dated 10/14/08
GST-4461	Ballot submitted for Taylor in Leslie Controls, dated 9/20/10
GST-4463	Trust Claim for Reginald Taylor submitted to ACandS
GST-4464	Trust Claim for Reginald Taylor submitted to ASARCO
GST-4465	Trust Claim for Reginald Taylor submitted to AWI
GST-4466	Trust Claim for Reginald Taylor submitted to B&W
GST-4467	Trust Claim for Reginald Taylor submitted to Celotex
GST-4468	Trust Claim for Reginald Taylor submitted to Combustion Eng'g
GST-4469	Trust Claim for Reginald Taylor submitted to Eagle Picher
GST-4470	Trust Claim for Reginald Taylor submitted to FB
GST-4471	Trust Claim for Reginald Taylor submitted to Federal Mogul (Flexitallic)
GST-4472	Trust Claim for Reginald Taylor submitted to DII (Halliburton)
GST-4473	Trust Claim for Reginald Taylor submitted to DII (HW)
GST-4474	Trust Claim for Reginald Taylor submitted to H.K. Porter
GST-4475	Trust Claim for Reginald Taylor submitted to Kaiser

Trial Exhibit #	Description
GST-4476	Trust Claim for Reginald Taylor submitted to Keene
GST-4477	Trust Claim for Reginald Taylor submitted to Leslie Controls
GST-4478	Trust Claim for Reginald Taylor submitted to Manville
GST-4479	Trust Claim for Reginald Taylor submitted to OC
GST-4480	Trust Claim for Reginald Taylor submitted to Plant Insulation
GST-4481	Trust Claim for Reginald Taylor submitted to Raymark
GST-4482	Trust Claim for Reginald Taylor submitted to Thorpe Insulation
GST-4483	Trust Claim for Reginald Taylor submitted to US Minerals
GST-4484	Trust Claim for Reginald Taylor submitted to USG
GST-4485	Trust Claim for Reginald Taylor submitted to Western
GST-4527	Deposition of Reginald Taylor (Vol 5), taken 5/16/05
GST-4563	2nd Amended PCC 2019 Statement for Steckler, Taylor, Treggett and Williams, dated 6/8/05
GST-4591	Judgment, Torres, Oscar, 03-22-10
GST-4601	Pltfs' 1st Supp Resp to Master Rogs, RFP & Disclosure
GST-4602	Pltfs' 2nd Supp Resp to Master Rogs, RFP & Disclosure
GST-4605	Pltfs' 3rd Supp Resp to Master Rogs, RFP & RFD
GST-4609	Pltfs' 4th Supp Resp to Master Rogs, RFP & Disclosure-Longo
GST-4610	Pltfs' 5th Supp MDL Discovery Resp
GST-4611	Pltfs' 6th Supp MDL Discovery Resp from 1-18-10
GST-4626	Pltfs' Responses to Fast Track Rogs, RFP & CWD
GST-4638	Deposition of Oscar Torres (Vol 1), taken 7/15/09
GST-4639	Deposition of Oscar Torres (Vol 2), taken 7/16/09
GST-4640	Pltfs' 1st Supp Resp to Fast Track Master Rogs & RFP
GST-4849	Torres Trial Transcript, dated 2/16/10
GST-4850	Torres Trial Transcript, dated 2/17/10
GST-4851	Torres Trial Transcript, dated 2/18/10
GST-4852	Torres Trial Transcript, dated 2/19/10
GST-4853	Torres Trial Transcript (Lemen Testimony), dated 2/19/10
GST-4854	Torres Trial Transcript, dated 2/23/10
GST-4855	Torres Trial Transcript, dated 2/24/10
GST-4856	Torres Trial Transcript, dated 2/25/10
GST-4857	Torres Trial Transcript, dated 2/26/10
GST-4858	Torres Trial Transcript, dated 3/2/10
GST-4859	Torres Trial Transcript, dated 3/3/10
GST-4860	Torres Trial Transcript, dated 3/4/10
GST-4861	Torres Trial Transcript, dated 3/5/10
GST-4862	Torres Trial Transcript, dated 5/27/10 (Post-Trial Relief Motions)
GST-4863	Torres Trial Partial Exhibits List
GST-4864	Torres Index of Exhibits
GST-4865	Torres Trial Transcript, dated 2/9/10 (Pre-Trial Motions)
GST-4926	Pltfs' 7th Supp Resp to Master Rogs, RFP & RFD
GST-4927	Babcock & Wilcox Trust Claim
GST-4928	Halliburton Trust Claim
GST-4929	Owens Corning Trust Claim
GST-4930	AMF Incorporated Proof of Claim
GST-5432	Deposition of Robert Treggett (Vol 2), taken 2/11/04
GST-5433	9/8/04 MIL Hearing Pre-trial
GST-5434	Treggett Trial vol 1, 9/9/04, Starts with Mini Openings/Jury
GST-5435	Treggett Trial, vol 10, 10-1-4-04
GST-5436	Treggett Trial, vol 11, 10-5-04
GST-5437	Treggett Trial, vol 12 part 1, 10-6-04
GST-5438	Treggett Trial, vol 12 part 2, 10-7-04

Trial Exhibit #	Description
GST-5439	Treggett Trial, vol 12 part 3, 10-7-04
GST-5440	Treggett Trial, vol 13, 10-8-15-04
GST-5441	Treggett Trial, vol 14, 10-18-04
GST-5442	Treggett Trial, vol 15, 10-19-20-04
GST-5443	Treggett Trial, vol 2, 9-14-15-04
GST-5444	Treggett Trial, vol 3, 9-16-04
GST-5445	Treggett Trial, vol 4, 9-17-04
GST-5446	Treggett Trial, vol 5 part 1, 9-20-04
GST-5447	Treggett Trial, vol 5 part 2, 9-21-04
GST-5448	Treggett Trial, vol 6, 9-22-23-04
GST-5449	Treggett Trial, vol 7, 9-27-04
GST-5450	Treggett Trial, vol 8, 9-28-29-04
GST-5451	Treggett Trial, vol 9, 9-30-04
GST-5452	Judgment.Treggett.10.20.04
GST-5455	PCC 2004 Treggett Ballot and Claimant Schedule
GST-5458	GI Holdings 2019 Statement for Treggett, dated 1/21/09
GST-5466	2nd Amended WRG 2019 Statement for Treggett, dated 5/14/09
GST-5468	Master Ballot for Federal Mogul submitted for Treggett, dated 10/29/04
GST-5471	Master Ballot for GI Holdings submitted for Treggett, dated 1/7/09
GST-5473	Master Ballot for NARCO submitted for Treggett, dated 3/9/06
GST-5474	Master Ballot for Owens Corning submitted for Treggett, dated 8/15/06
GST-5475	Master Ballot for PCC submitted for Steckler and Treggett, dated 11/10/09
GST-5476	Master Ballot for US Mineral submitted for Treggett, dated 10/26/05
GST-5477	Master Ballot for WRG submitted for Treggett, dated 5/18/09
GST-5478	Trust Claim for Robert Treggett submitted to ABB Lummus
GST-5479	Trust Claim for Robert Treggett submitted to ACandS
GST-5480	Trust Claim for Robert Treggett submitted to AWI
GST-5481	Trust Claim for Robert Treggett submitted to B&W
GST-5482	Trust Claim for Robert Treggett submitted to Thurston
GST-5483	Trust Claim for Robert Treggett submitted to Combustion Engineering
GST-5484	Trust Claim for Robert Treggett submitted to Eagle Picher
GST-5485	Trust Claim for Robert Treggett submitted to Fibreboard
GST-5486	Trust Claim for Robert Treggett submitted to Federal Mogul
GST-5487	Trust Claim for Robert Treggett submitted to DII (Halliburton)
GST-5488	Trust Claim for Robert Treggett submitted to Keene
GST-5489	Trust Claim for Robert Treggett submitted to OC
GST-5490	Trust Claim for Robert Treggett submitted to Porter Hayden
GST-5491	Trust Claim for Robert Treggett submitted to Raymark
GST-5492	Trust Claim for Robert Treggett submitted to USG
GST-5493	Trust Claim for Robert Treggett submitted to Western
GST-5494	Plaintiff Responses to General Order Standard Interrogatories Propounded by Defendants, dated 2/6/04
GST-5498	Deposition of Robert Treggett (Vol 1), taken February 10, 2004
GST-5499	Deposition of Robert Treggett (Vol 3), taken February 12, 2004
GST-5500	Deposition of Robert Treggett (Vol 4), taken February 13, 2004
GST-5501	Deposition of Robert Treggett (Vol 5), taken February 17, 2004
GST-5515	AC&S 2019 Statement for Treggett and Williams, dated 9/21/06
GST-5522	Combustion 2019 Statement for Treggett and Williams, dated 10/3/05
GST-5526	GI 2019 Statement for Treggett and Williams, dated 12/9/04
GST-5545	Kaiser 2019 Statement for Treggett and Williams, dated 12/9/04
GST-5551	NARCO 2019 Statement for Treggett and Williams, dated 12/9/04
GST-5552	Amended NARCO 2019 Statement for Treggett and Williams, dated 3/15/05

Trial Exhibit #	Description
GST-5570	Amended OC 2019 Statement for Treggett and Williams, dated 3/15/05
GST-5576	PCC 2019 Statement for Treggett and Williams, dated 12/9/04
GST-5595	Amended USG 2019 Statement for Treggett and Williams, dated 3/15/05
GST-5609	Plaintiffs' Case Report, dated 5/6/04
GST-5610	Plaintiffs' Amendments to Case Report, dated 5/10/04
GST-5612	Deposition of Charles White, taken 8/11/06
GST-5624	Pltfs' 1st Supps Answers to MD
GST-5625	Pltfs' 2nd Supp Answers to MD
GST-5626	Pltfs' 3rd Supp Answers to MD
GST-5627	Pltfs' 4th Supp MD-2nd-Supp-RFD
GST-5628	Pltfs' 4th Supp MD-2nd-Supp-RFD-Exhibit B
GST-5629	Pltfs' 5th Supp to MD
GST-5630	Pltfs' 5th Supp to MD-Exhibit B-Part 1
GST-5631	Pltfs' 5th Supp to MD-Exhibit B-Part 2
GST-5632	Pltfs' 5th Supp to MD-Exhibit C-Part 2
GST-5633	Pltfs' 5th Supp to MD-Exhibit C-Part 1
GST-5634	Pltfs' 6th Supp Answers to MD
GST-5635	Pltfs' 7th Supp Answers to MD
GST-5636	Pltfs' 8th Supp Answers to MD
GST-5655	Pltfs' Answers MDL MD Resp
GST-5773	Deposition of Barbara Lorton (taken Mar. 16, 2007)
GST-5791	Affidavit of Charles White (dated Feb. 28, 2007)
GST-5821	Amended Work History sheet for Charles White, Deposition Exhibit 1
GST-5974	Transcript of Pretrial proceedings on April 13, 2007 (Volume 1)
GST-5975	Transcript of Pretrial proceedings on March 26, 2007 (Volume 1)
GST-5976	Transcript of Pretrial proceedings on March 27, 2007 (Volume 2)
GST-5977	Trust Claim for Charles White submitted to ABB Lummus
GST-5978	Trust Claim for Charles White submitted to Artra
GST-5979	Trust Claim for Charles White submitted to ASARCO
GST-5980	Trust Claim for Charles White submitted to Armstrong
GST-5981	Trust Claim for Charles White submitted to B&W
GST-5982	Trust Claim for Charles White submitted to DII (HAL)
GST-5983	Trust Claim for Charles White submitted to Fibreboard
GST-5984	Trust Claim for Charles White submitted to Federal Mogul
GST-5985	Trust Claim for Charles White submitted to G-I Holdings
GST-5986	Trust Claim for Charles White submitted to H.K. Porter
GST-5987	Trust Claim for Charles White submitted to Porter Hayden
GST-5988	Trust Claim for Charles White submitted to THAN
GST-5989	Trust Claim for Charles White submitted to USG
GST-5990	Trust Claim for Charles White submitted to J.T. Thorpe
GST-5991	Trust Claim for Charles White submitted to Western Asbestos
GST-5992	Trust Claim for Charles White submitted to Raybestos
GST-5993	Trust Claim for Charles White submitted to Celotex
GST-5994	Trust Claim for Charles White submitted to Bartells
GST-5995	Trust Claim for Charles White submitted to Eagle Picher
GST-5996	Trust Claim for Charles White submitted to John Manville
GST-5997	Trust Claim for Charles White submitted to Keene
GST-5998	Trust Claim for Charles White submitted to NGC
GST-5999	Trust Claim for Charles White submitted to OC
GST-6000	Trust Claim for Charles White submitted to Thurston
GST-6001	Williams.Amended Work History Sheet, dated 9/27/04
GST-6002	Williams.Plaintiffs' Case Report, dated 8/13/04

Trial Exhibit #	Description
GST-6003	Williams.Plaintiffs' Amended Response to General Order Standard Interrogatories, dated 12/6/04
GST-6004	Williams.Plaintiff's Response to General Order Standard Interrogatories, dated 4/29/04
GST-6005	Judgment.Williams.2.7.05
GST-6006	WILLIAMS.Depo.8.18.04 (vol. 6)
GST-6007	Williams.Plaintiffs' Amended Case Report, dated 11/24/04
GST-6009	WILLIAM.Depo.7.29.04 (vol. 2)
GST-6010	WILLIAM5.Depo.8.17.04 (vol. 5)
GST-6011	WILLIAMS.Depo.7.28.04 (vol. 1)
GST-6012	WILLIAMS.Depo.7.30.04 (vol. 3)
GST-6013	WILLIAMS.Depo.8.16.04 (vol. 4)
GST-6014	WILLIAMS.Depo.9.1.04 (vol. 7)
GST-6015	WILLIAMS.Depo.9.2.04 (vol. 8)
GST-6020	GI Holdings 2019 Statement for Williams, dated 1/21/09
GST-6021	JT Thorpe 2019 Statement for Williams, dated 6/2005
GST-6026	Thorpe Insulation 2019 Statement for Williams, dated 10/14/08
GST-6029	2nd Amended WRG 2019 Statement, dated 5/14/09, for Williams
GST-6030	AC&S Ballot for Tommie Williams and Treggett, dated 3/19/08
GST-6031	Ballot for Tommie Williams submitted in ASARCO, dated 7/23/09
GST-6032	Ballot for Tommie Williams submitted in Federal Mogul, dated 10/29/04
GST-6033	Ballot for Tommie Williams submitted in FB, dated 8/28/06
GST-6034	2009 Flintkote Ballot for Tommie Williams
GST-6035	2009 Flintkote Mines Ballot for Tommie Williams
GST-6036	Ballot for Tommie Williams submitted in G-I Holdings, dated 1/7/09
GST-6037	Ballot for Tommie Williams submitted in JT Thorpe, dated 5/9/05
GST-6038	Ballot for Tommie Williams and Treggett submitted in Kaiser, dated 11/9/05
GST-6039	Ballot for Tommie Williams submitted in OC, dated 8/15/06
GST-6040	Ballot for Tommie Williams submitted in PCC, dated 11/10/09
GST-6041	Ballot for Tommie Williams submitted in Quigley, dated 11/12/12
GST-6042	Ballot for Tommie Williams submitted in US Minerals, dated 10/26/05
GST-6043	Ballot for Tommie Williams submitted in WR Grace, dated 5/18/09
GST-6044	Trust Claim for Tommie Williams submitted to ABB Lummus
GST-6045	Trust Claim for Tommie Williams submitted to AC&S
GST-6046	Trust Claim for Tommie Williams submitted to AWI
GST-6047	Trust Claim for Tommie Williams submitted to ASARCO
GST-6048	Trust Claim for Tommie Williams submitted to B&W
GST-6049	Trust Claim for Tommie Williams submitted to Burns and Roe
GST-6050	Trust Claim for Tommie Williams submitted to Celotex
GST-6051	Trust Claim for Tommie Williams submitted to Combustion Engineering
GST-6052	Trust Claim for Tommie Williams submitted to Eagle Picher
GST-6053	Trust Claim for Tommie Williams submitted to Fibreboard
GST-6054	Trust Claim for Tommie Williams submitted to DII (Halliburton)
GST-6055	Trust Claim for Tommie Williams submitted to DII (HFW)
GST-6056	Trust Claim for Tommie Williams submitted to H.K. Porter
GST-6057	Trust Claim for Tommie Williams submitted to J.T. Thorpe
GST-6058	Trust Claim for Tommie Williams submitted to Kaiser
GST-6059	Trust Claim for Tommie Williams submitted to Keene
GST-6060	Trust Claim for Tommie Williams submitted to Manville
GST-6061	Trust Claim for Tommie Williams submitted to NGC
GST-6062	Trust Claim for Tommie Williams submitted to OC
GST-6063	Trust Claim for Tommie Williams submitted to Raytech
GST-6064	Trust Claim for Tommie William submitted to Artra
GST-6065	Trust Claim for Tommie Williams submitted to Thorpe

Trial Exhibit #	Description
GST-6066	Trust Claim for Tommie Williams submitted to USG
GST-6067	Waters & Kraus Letter to NGC re providing missing pages of Williams trust claim, dated December 10, 2008
GST-6084	Trial Transcript - 2/2/05
GST-6085	Trial Transcript - 2/2/05 PM
GST-6086	Trial Transcript - 2/7/05 AM
GST-6087	Trial Transcript - 1/21/05 PM
GST-6088	Trial Transcript - 1/21/05 AM
GST-6089	Trial Transcript - 2/7/05 AM